

*Before the*  
Federal Communications Commission  
Washington D.C. 20554

In the Matter of )  
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The Petition for Class Waiver of FCC )  
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Sponsorship Identification Requirements )  
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Filed By the Radio Broadcasters Coalition )

MB Docket No. 15-52

As supporters of college radio, community radio, low power FM, and community media, we respectfully submit the following brief joint comments to the FCC Media Bureau strongly opposing the petition by the Radio Broadcasters Coalition to waive the Sponsorship ID (SID) requirement.

Community radio, college radio, and LPFM stations play a unique role in serving the needs of local communities, and this gives us a firsthand perspective on why truly local radio matters, especially as ownership consolidation has erased much of the local character from commercial radio. We agree with Future of Music Coalition’s arguments that preventing structural payola is essential for promoting broadcast localism, and that any weakening of the on-air disclosure requirements encourages structural payola and is contrary to the public interest.

The Media Institute contends in its filing that “more information is better,” pointing to the petition’s more detailed description of the types of consideration provided. However, if this petition is granted, the net impact for most listeners will undoubtedly be less information about sponsored programming. Radio is a medium that accommodates different types of listening, for long and short periods of time, at widely varying times of day. An on-air announcement at the time sponsored programming is broadcast is the best way to ensure all listeners have access to this information.

The Media Institute further argues that “information across multiple platforms is the norm”, and that the petition would allow “broadcasters to provide more information than ever by utilizing their websites as readily available sources of sponsorship information.” While there are clear benefits to having additional SID information available online, waiving the on-air disclosure requirements is not a necessary precondition to take this step. Nothing is disallowing these broadcasters from providing this information now.

The Media Institute even suggests that users “could even get that information online simultaneously while they were enjoying their music or sports, if they wished to do so.” This seems impractical, dangerous, and potentially illegal in many states, considering that the most common location for

radio listening is “in the car.” 60.4% of adults report this is where they listen most, according to a recent Radio Advertising Bureau factsheet.<sup>1</sup>

Radio is a medium that is of special importance to many communities, including low income communities and communities of color. While we applaud efforts to address the digital divide, there are still wide disparities in internet access by race and class.<sup>2</sup> Moving SID information primarily online will mean that low income listeners and communities of color will have less access to this important information than wealthy and white listeners.

Thus, contrary to the argument made by Multicultural Media Telecom and Internet Council that approval of the waiver petition “will be of particular benefit to minority broadcasters,” it’s clear that rolling back the on-air SID requirement will be particularly harmful to minority communities.

MMTC also asserts that the distinction drawn in the petition between sports and music programming and news content is appropriate, but music is itself a powerful vehicle for ideas and perspectives on social and political issues. If this waiver were granted, large corporations could purchase airtime for songs advocating for their preferred social or political viewpoints, and again, the vast majority of listeners would never know.

We thank you for your consideration.

*Albuquerque Center for Peace and Justice*  
*Center for Media Justice*  
*Common Cause*  
*Future of Music Coalition*  
*Media Alliance*  
*National Federation of Community Broadcasters*  
*The People’s Press Project*  
*Prometheus Radio Project*  
*United Church of Christ OC Inc*

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<sup>1</sup> [www.rab.com/whyradio/images/Full\\_Fact\\_Sheet\\_V2.pdf](http://www.rab.com/whyradio/images/Full_Fact_Sheet_V2.pdf)

<sup>2</sup> <http://www.pewinternet.org/2014/01/06/african-americans-and-technology-use/>