

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Promoting Diversification of Ownership)	MB Docket No. 07-294
In the Broadcasting Services)	
)	
Amendment of Part 1 of the Commission’s)	MD Docket No. 10-234
Rules, Concerning Practice and Procedure,)	
Amendment of CORES Registration)	
System)	

To: Secretary, Federal Communications Commission
Attention: The Commission

**EX PARTE COMMENTS
OF PUBLIC TELEVISION AND RADIO LICENSEES**

The group of seventy (70) public television and radio station licensees shown below (collectively, “Public Broadcasting Licensees”), by their attorneys, submit these additional comments responsive to the *Second Further Notice of Proposed Rulemaking and Seventh Further Notice of Proposed Rulemaking* in MB Docket No. 07-294 and MD Docket No. 10-234, FCC 15-19 (released February 12, 2015) (“*Further Notice*”). The *Further Notice* proposes to require “Restricted Use” FRNs (“RUFNRs”) to be used in reporting individual attributable interest holders on ownership reports filed by noncommercial educational (“NCE”) radio and television stations.

The purpose of these Comments is to reiterate and reinforce the positions taken by the Public Broadcasting Licensees in their extensive Joint Comments filed in this

proceeding on March 27, 2015 (“Joint Comments”). Those Joint Comments strongly opposed the FCC’s proposal, noting that the collection of information about governing board members of NCE stations will contribute nothing useful to the FCC’s picture of diversification of broadcast ownership, because persons reported on NCE ownership reports are not “owners” of broadcast stations as that concept is understood by the FCC and the Courts. Indeed, collection and retention of this information with commercial broadcast ownership information will taint the value of such information, by mixing data on ownership (of commercial stations) with data that does not reflect ownership (of NCE stations).

Moreover, the highly personal information proposed to be submitted by NCE governing board members to obtain an RUFERN – full name, residence address, date of birth and last four digits of the social security number -- poses grave risks of identity theft, violations of privacy, and compromised personal security. This is particularly true given that the federal government has been repeatedly shown over the last year to be abjectly incapable of protection of stored personal data.

Given the realities noted above, the FCC’s insistence on obtaining such highly personal information from NCE station board members will discourage worthy individuals from volunteering, cause harm to NCE stations and their relationships with their governing boards, risk the personal security of board members, and cause compliance difficulties for NCE stations whose board members cannot be compelled to make the necessary disclosures.

The FCC’s proposal as it would apply to NCE stations is bad policy and legally unsupportable. Adoption will damage the FCC’s efforts to comply with court mandates to collect accurate ownership information about broadcast station ownership. With other

reasonable alternatives available to the FCC, such as voluntary certifications by licensees of the accuracy of their disclosed board member information, the FCC's proposal is also entirely unnecessary.

The proposed Order before the Commission needs to be amended to remove the applicability of the RUFNR requirement.

Respectfully submitted,

**ALASKA PUBLIC
TELECOMMUNICATIONS, INC.**

**ARIZONA BOARD OF REGENTS FOR
BENEFIT OF THE UNIVERSITY OF
ARIZONA**

**ARKANSAS EDUCATIONAL TELEVISION
COMMISSION**

**BOARD OF DIRECTORS OF THE
CALIFORNIA STATE UNIVERSITY, LONG
BEACH RESEARCH FOUNDATION**

**BOARD OF GOVERNORS OF MISSOURI
STATE UNIVERSITY**

**BOARD OF REGENTS, UNIVERSITY OF
WISCONSIN SYSTEM**

**BOARD OF SUPERVISORS, LOUISIANA
STATE UNIVERSITY & AGRICULTURAL
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COLLEGE DISTRICT NO. 508, COUNTY OF
COOK AND STATE OF ILLINOIS**

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TELECOMMUNICATIONS COMMISSION**

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TELEVISION CORP.**

**GREATER CINCINNATI TELEVISION
EDUCATIONAL FOUNDATION**

**GREATER DAYTON PUBLIC TELEVISION,
INC.**

**HAMPTON ROADS EDUCATIONAL
TELECOMMUNICATIONS ASSOCIATION**

**HAWAII PUBLIC TELEVISION
FOUNDATION**

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KENT STATE UNIVERSITY

**KENTUCKY AUTHORITY FOR
EDUCATIONAL TELEVISION**

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TELECOMMUNICATIONS CORPORATION**

**MICHIANA PUBLIC BROADCASTING
CORP.**

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**MOUNTAIN LAKE PUBLIC
TELECOMMUNICATIONS COUNCIL**

**NEBRASKA EDUCATIONAL
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**NEW JERSEY PUBLIC BROADCASTING
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TELEVISION OF OHIO, INC.**

**NORTHEASTERN PENNSYLVANIA
EDUCATIONAL TELEVISION
ASSOCIATION, INC.**

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**NORTHERN MINNESOTA PUBLIC
TELEVISION, INC.**

THE OHIO STATE UNIVERSITY

OHIO UNIVERSITY

**OKLAHOMA EDUCATIONAL TELEVISION
AUTHORITY**

OKLAHOMA STATE UNIVERSITY

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**PUBLIC BROADCASTING OF NORTHWEST
PENNSYLVANIA, INC.**

PUBLIC TELEVISION 19, INC.

PURDUE UNIVERSITY

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UNIVERSITY**

**REGENTS OF THE UNIVERSITY OF
CALIFORNIA**

**REGENTS OF THE UNIVERSITY OF
MICHIGAN**

**REGENTS OF THE UNIVERSITY OF NEW
MEXICO (KUNM)**

**REGENTS OF THE UNIVERSITY OF NEW
MEXICO AND BOARD OF EDUCATION OF
THE CITY OF ALBUQUERQUE, NEW
MEXICO (KNME)**

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MENDEZ**

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**WINDOW TO THE WORLD
COMMUNICATIONS, INC.**

WITF, INC.

WNIN TRI-STATE PUBLIC MEDIA, INC.

**WSKG PUBLIC TELECOMMUNICATIONS
COUNCIL**

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December 4, 2015