

December 7, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: MB Docket No. 07-294, *Promoting Diversification of Ownership in the Broadcasting Services*; MB Docket No. 10-103 *Review of Media Bureau Data Practices*; MD Docket No. 10-234, *Amendment of Part I of the Commission's Rules, Concerning Practice and Procedure, Amendment of the CORES Registration System*

Dear Ms. Dortch:

On December 4, 2015, representing the University of Michigan ("U of M"), I had a brief conversation with Jennifer Thompson, Special Advisor to Commissioner Rosenworcel, and said:

(1) The U of M commended the Commission's efforts to craft rules to promote minority and female broadcast media ownership, and understood the Commission's need to improve its ownership data in order to do so.

(2) The proposed rules could be improved by allowing public educational institutions that own radio stations to provide demographic information about individuals serving on the governing bodies of those stations, without providing those individuals' names, addresses, birthdates, and partial Social Security numbers.

(3) Demographic information about individuals serving on the governing bodies of public educational institutions that own radio stations would be of relatively little value to the Commission's efforts to increase diversity in media ownership. The selection process for the governing bodies of these state institutions – such as the University of Michigan's Board of Regents – was unrelated both to the radio stations they own and to the commercial radio market.

(4) To the degree demographic information about those serving on the boards of these state institutions has any value, that information could be provided to the FCC without the personally identifiable information (PII) that the Commission staff proposes to collect.

(5) Collecting PII exposes those serving on the governing boards of public university broadcasters (government officials who are often targets for those unhappy with their decisions) to significant security and identity-theft risks.

(6) The only expressed rationale for requiring PII from the board members of broadcasters – to determine "whether the number of individual owners increased or whether existing owners

Ms. Marlene H. Dortch

December 7, 2015

Page 2 of 2

acquired additional stations”¹ – simply does not apply to government officials serving on the boards of public university broadcasters.

(7) Thus, balancing the benefit and the potential harm suggests that the Commission should not demand PII from these government officials.

In short, the Commission should take steps to improve its data collection practices, and should also craft policies to promote diversity in the broadcast media ownership market. Requiring public educational institutions to provide sensitive PII about their broadcast board members advances neither goal, and exposes government officials to needless risk.

Please contact me if you have any questions.

Sincerely,

Scott Blake Harris

Scott Blake Harris

Counsel to The University of Michigan

cc: Jennifer Thompson

¹ *Promoting Diversification of Ownership in the Broadcasting Services*, Second Further Notice of Proposed Rulemaking and Seventh Further Notice of Proposed Rulemaking, 30 FCC Rcd. 1725, ¶ 24 n.115 (2015).