

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Promoting Diversification of Ownership In the Broadcasting Services)	MB Docket No. 07-294
)	
Review of Media Bureau Data Practices)	MB Docket No. 10-103
)	
Amendment of Part 1 of the Commission's Rules, Concerning Practice and Procedure, Amendment of CORES Registration System)	MB Docket No. 10-234
)	

To: Secretary, Federal Communications Commission
Attention: The Commission

PETITION FOR RECONSIDERATION

By: /s/ Todd D. Gray
Todd D. Gray
Margaret L. Miller

Their Counsel

Gray Miller Persh LLP
1200 New Hampshire Ave. NW
Suite 410
Washington, DC 20036
(202) 776-2571
tgray@graymillerpersh.com

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SUMMARY

Numerous noncommercial educational (“NCE”) television and radio station licensees (“NCE Licensees”) petition for reconsideration of the *Report and Order* in MB Docket Nos. 07-294, 10-103 and 10-234, which adopted new rules requiring FRNs or RUFNRs for NCE station governing board members.

The NCE Licensees seek reconsideration of the Commission’s conclusions about the impact of its application of the FRN/RUFNR requirement to NCE station licensees, because those conclusions have no support in the record. The Commission dismissed substantial concerns about requiring NCE licensee board members to provide their full name, date of birth, residence address and last four SSN digits, stating that “we are not persuaded” and “we do not believe” that the requirements would cause the harm suggested by NCE stations. However, the record does not provide any basis for the Commission’s “persuasion” and “belief.” There is no fact, statement or argument in the record on which the Commission can reach the conclusion that the concerns of NCE licensees are not real and serious problems as NCE licensees contend.

Moreover, the Commission cannot plausibly claim to have expertise and experience to predict (1) what reactions current or prospective NCE board members – typically public officials and non-paid volunteers – will have to the requirement that they must disclose to the station and/or the FCC sensitive private information; or (2) what actions current or prospective NCE board members will take if faced with the prospect of being forced to provide such information, or with enforcement action by the FCC, or if their action might cause their public or nonprofit entity to be subject to enforcement action by the FCC; or (3) whether in such circumstances current or prospective NCE board members will decline to participate further as board members (in the case of those persons who actually are able to decline to participate, some public officials

holding board positions by virtue of their unrelated public office and thus being unable to resign their board positions); or (4) what tensions and stresses will be created between NCE stations, their management, and their governing boards and board members, including in some cases public officials, by virtue of the FCC's requirements; or (5) what effects these tensions will have over time on the quality of board leadership for NCE stations, and the impact of such tensions on NCE stations and public broadcasting in local markets and nationwide; or (6) what effect the FCC requirements and possible FCC enforcement actions against a station or a board member will have on NCE stations' standing in and engagement with the community, including future community support for NCE stations.

In the face of substantial contrary record evidence and the lack of any reasoned explanation based on Commission expertise and experience, the *Report and Order's* conclusions on this point are arbitrary and capricious.

In addition, the Commission arbitrarily and capriciously failed to consider an alternative data collection mechanism that would satisfy its perceived need for gender, race and ethnicity data on NCE station governing board members, without causing the harm demonstrated in the record.

Finally, the statutory basis cited by the *Report and Order* for the imposition of the FRN/RUFNR requirement on NCE station licensees -- Section 257 of the Telecommunications Act of 1996 and Section 309(j) of the Communications Act of 1934 -- do not in fact support the Commission's actions.

For these reasons, the FRN/RUFNR requirement in the context of NCE station licensees should be reconsidered.

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To: Secretary, Federal Communications Commission
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PETITION FOR RECONSIDERATION

The noncommercial educational (“NCE”) television and radio station licensees shown below (collectively, the “NCE Licensees”), by their counsel and pursuant to Section 1.429 of the Commission’s rules, respectfully petition for reconsideration of the *Report and Order, Second Report and Order, and Order on Reconsideration* in the referenced matter (“*Report and Order*”). The FCC ignores substantial, un-contradicted evidence in the record regarding the negative impact on NCE broadcast stations of the new rules requiring FRNs or RUFNRs for NCE governing board members. The new rules, therefore, are arbitrary and capricious with respect to NCE stations.

Moreover, the Commission’s cited statutory authority for imposition of the FRN/RUFNR requirements -- Section 309(j) and Section 257 of the Communications Act -- does not apply to

NCE stations or NCE “ownership.” Thus, the *Report and Order* does not articulate a statutory basis for the imposition of the FRN/RUFRN requirement on NCE stations.

Background

The NCE Licensees and various other noncommercial educational station licensees have participated in this proceeding by filing comments strongly opposing the FCC’s proposals to require their governing board members to provide sensitive personally identifiable information in order to obtain FRNs or RUFRNs.¹ They have argued, on each occasion, for nearly a decade, that the collection of information about board members of NCE stations would 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, particularly as that concept is understood by Congress, the FCC and the Courts for purposes of ownership diversity.² Indeed, they pointed out that, for the purposes of the sort of analysis contemplated by the *Prometheus* court to justify FCC diversity initiatives, the collection, retention and presentation of NCE board member information with commercial broadcast ownership information will actually taint the value of such information, by mixing data on actual ownership (of commercial stations, for which there are statutory and FCC regulatory limitations on multiple ownership) with data that does not reflect ownership (of NCE stations, for which there are no statutory or FCC regulatory limitations on multiple ownership). Thus, the FCC’s proposal to include NCE

¹ See Joint Comments of Public Television and Radio Licensees, filed March 27, 2015; Ex Parte Comments of Public Television and Radio Licensees, filed December 4, 2015; see also comments of other NCE licensees referenced below.

² See prior filings by the NCE Licensees and other NCE stations in MB Docket No. 07-294, MB Docket No. 10-103 and MB Docket No. 10-234.

stations actually will frustrate and impede the goals advanced by the FCC (but to date rejected by the *Prometheus* court as unsubstantiated.)

Moreover, the NCE Licensees and others have argued that the highly sensitive personal information proposed to be required of NCE governing board members to obtain an FRN (a person's social security number) or RUFNRN (full name, residence address, date of birth and last four digits of the social security number) causes board members to have serious concerns about identity theft, violations of privacy, and compromised personal security.

In view of these concerns, and based on their own clear, relevant, direct and personal knowledge and experience with NCE governing boards, parties representing NCE stations, as well as an actual former NCE board member, argued that adoption of the FCC's proposal would cause serious harm to NCE stations by making it difficult to recruit and retain qualified board members, by creating harmful friction between NCE stations and their institutional license holders, and ultimately, by creating compliance difficulties for stations whose board members refuse to provide the required information.

In addition, one NCE station licensee offered a possible alternative mechanism that could avoid the damage that would be caused by the FCC's proposal but would still allow the Commission to obtain statistical gender, ethnicity and race information about NCE board members.³

In the *Report and Order*, the Commission nevertheless adopted its proposal to require broadcast station owners to obtain FRNs or RUFNRNs and determined that these rules should apply to NCE stations, concluding that "we are not persuaded that the requirement will

³ See Ex Parte Letter of Scott Blake Harris to Marlene H. Dortch, December 7, 2015.

significantly inhibit individuals from serving on the boards of NCEs,” and “we do not believe that the FRN requirement would serve as a serious disincentive to participation in NCE stations.”⁴

The NCE Licensees seek reconsideration of the Commission’s conclusions about the impact of its application of the FRN/RUFRN requirement to NCE station licensees, because those conclusions have no support in the record. In addition, the impact of these requirements on NCE board members, board structures and NCE stations is not even arguably within the agency’s accumulated knowledge and expertise. Whether based on uninformed opinion, willful refusal to consider record evidence, or regulatory zeal in implementing a mis-perceived court-imposed mandate that these new rules must cover NCE stations who are not subject to statutory or regulatory multiple ownership limits, the decision is not based on the record evidence and is thus arbitrary and capricious. It must be reconsidered.

The Report and Order’s Conclusions Dismissing Damage Caused by the FRN/RUFRN Requirement to NCE Licensee Board Members, Board Structures and NCE stations have No Support in the Record

As noted above, in the *Report and Order*, the Commission dismissed substantial concerns by well over a hundred noncommercial educational licensees about requiring NCE licensee board members to provide their full name, date of birth, residence address and last four SSN digits, stating that “we are not persuaded” and “we do not believe” that the requirements would cause the harm suggested by NCE stations.

The record of this proceeding does not provide any basis for the Commission’s “persuasion” and “belief.” There is no fact, statement or argument by *anyone* in the record on

⁴ *Report and Order* at ¶55.

which the Commission can reach the conclusion that the consistently articulated concerns of multiple NCE licensees are not real and serious problems as NCE licensees contend.

The following information is in the record on this matter and supports the concerns put forth by NCE licensees:

Experience shows that unpaid volunteers and public officials serving on boards are strongly against submitting this information; requiring this information will discourage worthy individuals from serving; there are examples of strong objection by a senior government official serving on an NCE board and the actual resignation of a prominent NCE board member.⁵

Requiring personal information will put an obstacle in the way of finding strong, competent station leadership and non-profit Board membership and undermine the ability of NCE licensees to perform their missions.⁶

Requiring disclosure of this type of personal sensitive information may discourage participation by prospective board members.⁷

The proposal will discourage individuals from serving on boards of directors of public broadcasting stations; losing these individuals would exact a heavy toll on public broadcasting.⁸

Requiring NCE station board members to obtain RUFNRs will make it more difficult to recruit and maintain qualified NCE station board members, create harmful friction between stations and their institutional license holders, and cause damage to NCE stations' board membership structures, station/licensee relationships and, ultimately, to NCE stations themselves.⁹

Given the likelihood that many individuals will be reluctant, or will even flatly refuse, to provide their data, the burden on the licensee to provide that information is substantial.¹⁰

In light of the fact that persons who serve on NCE licensee boards do so as a service to the community, the proposal is an unwarranted intrusion and will likely discourage

⁵ Joint Comments of Public Television and Radio Licensees, filed March 27, 2015.

⁶ Comments of Taylor University Broadcasting, Inc., filed March 27, 2015.

⁷ Comments of University Station Alliance, filed March 27, 2015.

⁸ Comments of the Association of Public Television Stations, Corporation for Public Broadcasting, National Public Radio and Public Broadcasting Service, filed March 30, 2015.

⁹ Comments of Public Radio Regional Organizations, filed March 30, 2015.

¹⁰ Comments of Alabama Educational Television Commission *et al.*, filed March 30, 2015.

individuals from serving; the proposal could well cause current volunteers to step down rather than submit.¹¹

The personal information proposed to be submitted to obtain an RUFNRN poses serious risk of identity theft, violations of privacy rights, and compromised personal security, and it will make it more difficult for NCE licensees to recruit and maintain qualified board members, thereby causing irreparable damage to NCE stations' board membership structures; requiring board members to provide such sensitive private information as a condition of service will discourage experienced individuals from volunteering to continue to serve, or commence service.¹²

The proposal would be worse than simply ineffective – it would cause serious harm to NCE broadcast stations; NCE station board members are more likely to be deterred by the threat of identity theft than are individuals with attributable interests in commercial stations, who are compensated financially for taking the risks associated with station ownership.¹³

The proposal would serve no useful purpose and, frankly, I would not have served, and probably would not have contributed, if such a requirement were in force when I was asked to join a NCE board.¹⁴

The following information is in the record on this matter and supports the Commission's "persuasion" and "belief" that the newly-adopted requirements would not cause the harm suggested by NCE stations:

Nothing.

When an agency's decision runs counter to the evidence before the agency, as does the Commission's dismissal of the harm that will be caused by the application of the FRN/RUFNRN

¹¹ Comments of Public Broadcast Licensees, filed March 30, 2015.

¹² Joint Comments of Moody Bible Institute, *et al.*, filed March 30, 2015.

¹³ Joint Reply Comments of the University of Utah, *et al.*, filed April 13, 2015.

¹⁴ Ex Parte Comment of Thomas K. Dawson, filed February 25, 2016.

requirements to NCE stations, that decision is arbitrary and capricious.¹⁵

The Likely Effect of the FRN/RUFNR Requirement on NCE Board Members, Board Structures and NCE stations is Not a Matter within the Expertise of the Commission

Reviewing courts will give appropriate deference to predictive judgments that necessarily involve the expertise and experience of the agency.¹⁶ Here, however, the Commission cannot plausibly claim to have expertise and experience to predict (1) what reactions current or prospective NCE board members – typically public officials and non-paid volunteers – will have to the requirement that they must disclose to the station and/or the FCC sensitive private information; or (2) what actions current or prospective NCE board members will take if faced with the prospect of being forced to provide such information, or with enforcement action by the FCC, or if their action might cause their public or nonprofit entity to be subject to enforcement action by the FCC; or (3) whether in such circumstances current or prospective NCE board members will decline to participate further as board members (in the case of those persons who actually are able to decline to participate, some public officials holding board positions by virtue of their unrelated public office and thus being unable to resign their board positions); or (4) what tensions and stresses will be created between NCE stations, their management, and their governing boards and board members, including in some cases public officials, by virtue of the FCC's requirements; or (5) what effects these tensions will have over time on the quality of board leadership for NCE stations, and the impact of such tensions on NCE stations and public

¹⁵ *Motor Vehicles Mfrs. Ass'n v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983) (an agency acts arbitrarily and capriciously when its offered explanation runs counter to the evidence before the agency).

¹⁶ *Federal Communications Commission v. National Citizens Committee for Broadcasting*, 436 U.S. 775, 814 (1978).

broadcasting in local markets and nationwide; or (6) what effect the FCC requirements and possible FCC enforcement actions against a station or a board member will have on NCE stations' standing in and engagement with the community, including future community support for NCE stations.

In the face of substantial contrary evidence in the record, the lack of any reasoned explanation for the Commission's predictive judgments about the lack of harm caused by the FRN/RUFRN requirement in the NCE station context, and in the further absence of expert knowledge of the Commission on NCE governing board issues, the Commission's unsupported conclusions are not entitled to deference.¹⁷ It is arbitrary and capricious for the FCC to conclude that its FRN/RUFRN requirements will not harm NCE broadcasting.¹⁸

The Commission Failed to Consider a Less Harmful Alternative to the FRN/RUFRN Requirement for NCE Stations that would Fully Satisfy the FCC's Need for Comprehensive Ownership Data on Gender, Race and Ethnicity

Because of the Commission's arbitrary and capricious dismissal of the NCE broadcast industry's demonstration of harm that would be caused to NCE stations by the FRN/RUFRN requirement, it apparently saw no need to consider whether there might an alternative data collection mechanism that would fully satisfy its perceived need for comprehensive data on gender, race and ethnicity of "owners" of NCE stations (i.e., those persons serving on NCE governing boards) but avoid the demonstrated harm. It is especially important for the FCC to

¹⁷ *Chevron U.S.A., Inc. v. Natural Res. Defense Council, Inc.*, 467 U.S. 837, 842-42 (1984).

¹⁸ *ACLU v FCC*, 823 F.2d 1554, 1581 (agency action is arbitrary unless it "respond[s] to all significant comments, for the opportunity to comment is meaningless unless the agency responds to significant points raised by the public") (D.C. Cir. 1987); *Natural Resources Defense Council v. EPA*, 790 F.2d 289, 315 (3d Cir. 289); *City of Waukesha v. EPA*, 320 F.3d 228, 258 (D.C. Cir. 2003).

consider such alternatives because NCE stations are not similarly situated to commercial stations with regarding to “ownership,” even if ownership is styled as “attribution,” as the FCC lacks any statutory or regulatory basis to regulate multiple “ownership” of NCE stations.¹⁹

The record, however, reflects one alternative mechanism put forth by the University of Michigan in a meeting with FCC staff, as reflected in its December 7, 2015 *ex parte* notice.

The University suggested that, for public educational institutions, licensees could provide demographic information (i.e., gender, race and ethnicity) of persons reported on NCE station Forms 323-E, but without the requirement of personally identifiable information, such as that necessary to obtain an FRN/RUFRN. This proposal does not need to be limited, however, to public educational institutions. It could be applied to other NCE station licensees – other public sector licensees (such as state public broadcasting commissions) and private nonprofit/non-stock licensees (such as private educational institutions and charitable community organizations). In light of the harm to NCE stations reflected in the record, the Commission’s failure to consider such an alternative to mitigate such harm is itself arbitrary and capricious, and not in the public interest.²⁰

The NCE Licensees believe that this approach would be generally acceptable to the NCE community. In fact, licensees of NCE stations that are CPB-qualified already provide gender, race and ethnicity information to the Corporation for Public Broadcasting, as the *Report and*

¹⁹ Taken to its logical conclusion, this point means that the FCC’s new rules for NCE governing board members cause substantial harm to NCE stations without any corresponding statutory or regulatory benefit, since any FRN/RUFRN data collected from NCE stations is completely unrelated to any underlying statute or FCC regulation on NCE multiple ownership limits.

²⁰ *Prometheus Radio Project v. FCC*, 373 F.3d 372 at 389-90 (3d Cir. 2004) (reviewing court must “ensure that, in reaching its decision, the agency examined the relevant data and articulated a satisfactory explanation for its action.”)

Order acknowledged.²¹ The NCE Licensees also urge that this approach should be acceptable to the Commission, as it satisfies its fundamental desire to track and assess gender, race and ethnicity in broadcast “ownership.” This approach would also be fully responsive to the criticisms by the Government Accountability Office’s oft-cited report on Media Ownership,²² which focused, among other things, on the Commission’s lack of data on gender, race and ethnicity to evaluate ownership diversity of commercial stations and which report mentioned, in particular, the lack of gender, race and ethnicity data for noncommercial stations.²³

The Commission’s Cited Statutory Authority for Imposition of the FRN/RUFRN Requirements Does Not Apply to NCE Stations

In the *Report and Order*, at ¶3, the Commission states that its authority for imposition of the FRN/RUFRN requirement is “our statutory mandate contained in Section 257 of the

²¹ *Report and Order* at ¶ 51, n 187.

²² See *Media Ownership: Economic Factors Influence the Number of Media Outlets in Local Markets, While Ownership by Minorities and Women Appears Limited and is Difficult to Assess*, Report to the Chairman of the Subcommittee on Telecommunications and the Internet, Energy and Commerce Committee, House of Representatives, GAO-08-383 (Mar. 2008).

²³ The NCE Licensees acknowledge that the approach set forth by the University of Michigan, expanded to cover all NCE stations, would not require reported individuals to obtain FRN/RUFRNs (*i.e.*, the “unique identifiers”). This should not be a reason to reject the proposal for several reasons. First, the FRN/RUFRN requirement is the key driver of NCE claims of harm in the Commission’s decision. If the Commission can collect needed data from NCE stations without requiring FRN/RUFRNs, the harm caused by the new rules is largely mitigated. Second, the FRN/RUFRN requirement in the NCE context is not necessary. The need for the FRN/RUFRN relates primarily to the Commission’s desire to track attributable individuals across the firmament of broadcast stations for the purpose of monitoring, enforcing, evaluating and possibly modifying the broadcast ownership limits set out in federal statute and in Section 73.3555 of the Commission’s rules, as mandated by Congress and the Courts, including the current Third Circuit proceeding in *Howard Stirk Holdings, LLC, v. FCC, Case No 15-3863*. As pointed out by Commissioner Pai, however, pursuant to Section 73.3555(f), these ownership limits do not apply to NCE stations. In fact, the multiple ownership limits (statutory or regulatory) have never applied to NCE stations. Thus, there is no regulatory necessity to be able to cross reference individuals listed on NCE ownership reports, as their presence on such reports has no relevance to broadcasting compliance with multiple ownership rules.

Telecommunications Act of 1996 and Section 309(j) of the Communications Act of 1934 to promote opportunities for small businesses and women and minorities in the broadcasting industry” In ¶ 44 of the *Report and Order*, in deciding that the statutory authority that provides it authority to collection ownership data from commercial stations is “equally applicable” in the NCE context, the Commission states that, “Further, the adoption of the CORES FRN requirement in the context of Form 323-E is supported by our statutory mandates under Section 257 of the 1996 Act and Section 309(j) of the Act.”

The NCE Licensees respectfully suggest that these cited statutory provisions actually do *not* support the Commission’s actions imposing the FRN/RUFRN requirements on noncommercial educational licensees.

Section 309(j) of the Communications Act by its own terms does not apply to NCE stations – Section 309(j)(2)(c) exempts NCE stations from competitive bidding, such that Section 309(j) (including Section 309(j)(3)), on which the FCC relies for its authority for imposing FRN/RUFRNs, simply does not apply to NCE stations.²⁴

Section 257 of the Communications Act directs the FCC to report to Congress on market entry barriers for entrepreneurs and other small businesses. Whether the FCC has authority (or not) under Section 257 to impose FRN/RUFRN requirements on commercial stations as “‘reasonably ancillary’ to the Commission's statutory responsibility to issue a report to Congress”²⁵ on market entry barriers (and the FCC has certainly referenced commercial broadcast ownership limits in its triennial reports to Congress under Section 257), it is not

²⁴ *Nat'l Pub. Radio, Inc. v. FCC*, 254 F.3d 226 (D.C. Cir. 2001) (Under the plain language of Section 309(j)(2), the FCC was required to exempt NCEs from participating in competitive bidding).

²⁵ *See Comcast Corp. v. FCC*, 600 F.3d 642 (D.C. Cir. 2010).

plausible to interpret Section 257 to authorize an FRN/RUFNR requirement for NCE broadcasters for purposes of such report.²⁶ In fact, it is not at all clear what “market entry” barriers for entrepreneurs and small businesses as set forth in Section 257 might mean in the NCE broadcasting context. More tellingly, however, neither the initial Section 257 report issued by the Commission to Congress, nor any subsequent triennial report, has discussed (or even mentioned) NCE ownership, let alone market barriers to NCE broadcasting. For the FCC to now claim that RUFNRs for NCE board members are critical to an understanding of media ownership for its Section 257 reporting obligations is disingenuous at best.²⁷ Thus, the FCC’s cited authority to Section 257 to impose the FRN/RUFNR requirement on NCE stations does not apply.

²⁶ See, e.g., *In the Matter of 1998 Biennial Regulatory Review -- Streamlining of Mass Media Applications, Rules, and Processes; Policies and Rules Regarding Minority and Female Ownership of Mass Media Facilities*, 13 FCC Rcd 23056, 23251 (1998) (Comm’r Furchgott-Roth dissenting)(“We have no specific statutory authority to collect this information. Contrary to the assertion of this item... collection of this information is in no way necessary to fulfill our obligations under section 257.”)

²⁷ If Section 257 applies at all to NCE stations, the record in this proceeding amply demonstrates that the imposition of the RUFNR requirements on NCE board members (who are often volunteers or elected officials) is itself a “regulatory barrier” to the provision and “ownership” of telecommunication services by the affected NCE stations, such that the FCC should be making efforts to eliminate the RUFNR requirement for NCE board members.

Conclusion

The Commission had no basis in the record or in its expertise and experience to dismiss out of hand the demonstrated harm that would be caused NCE stations and NCE station licensees by applying the FRN/RUFRN requirement to NCE stations. Its decision to apply this requirement to NCE licensees is not supported by the record and is thus arbitrary and capricious. Moreover, the statutory authorities cited by the Commission do not apply to NCE stations. In light of such harm, and the lack of statutory authority, the Commission's failure at the very least to consider a less harmful alternative that should fully satisfy statutorily authorized data-collection needs is similarly arbitrary and capricious.

The NCE licensees urge that the Commission reconsider the *Report and Order* on these points.

Respectfully submitted,

**ALASKA PUBLIC
TELECOMMUNICATIONS, INC.**

**ARKANSAS EDUCATIONAL TELEVISION
COMMISSION**

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STATE UNIVERSITY**

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**BOARD OF TRUSTEES OF COMMUNITY
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THE OHIO STATE UNIVERSITY

OHIO UNIVERSITY

**OKLAHOMA EDUCATIONAL TELEVISION
AUTHORITY**

OKLAHOMA STATE UNIVERSITY

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PUBLIC TELEVISION 19, INC.

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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)

ROCKY MOUNTAIN PUBLIC BROADCASTING NETWORK, INC.

SOUTH CAROLINA EDUCATIONAL TELEVISION COMMISSION

STATE OF WISCONSIN – EDUCATIONAL COMMUNICATIONS BOARD

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WASHINGTON STATE UNIVERSITY

WAYNE STATE UNIVERSITY

**WEST CENTRAL ILLINOIS EDUCATIONAL
TELECOMMUNICATIONS CORPORATION**

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

WITF, INC.

By: /s/ Todd D. Gray

Todd D. Gray
Margaret L. Miller

Their Counsel

Gray Miller Persh LLP
1200 New Hampshire Ave. NW
Suite 410
Washington, DC 20036
(202) 776-2571
tgray@graymillerpersh.com

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