



The State University of New York

Office of General Counsel

State University Plaza
Albany, New York 12246

www.suny.edu

**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 I 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

REPLY OF THE STATE UNIVERSITY OF NEW YORK

The State University of New York¹ joins with our colleagues from across the United States in the Reply filed on or about June 13, 2016 by law firm Gray Miller Persh, LLP (Todd D. Gray and Margaret L. Miller, of counsel) in all respects in the referenced matter and herein write separately as a reply noting absolutely no opposition in the record by the opposition deadline (or since) to the separate Comment submitted by the undersigned in May 2016. As noted in the March Comment, there is yet to be any filing on the record that contravenes the consistent argument made by the State University alone and in concert with sister institutions across the United States.

¹ The Board of Trustees of the State University of New York is the Licensee/Permittee that registers on behalf of radio stations with the following call letters: WCDB; WHRW; WUSB; WBSU; WBNY; WSUC-FM; WGSU; WFNP; WRVO; WRVN; WRVJ; WQKE; WETD; WNYO; WAIH; WCVF-FM; WRVD; WXXE; WRVH; WONY. The members of the Board of Trustees are appointed by the Governor of the State of New York, subject to confirmation by the New York State Senate. Alongside the Members of the Board of Trustees, the State University of New York, on form 323-e, likewise lists information for the Chancellor and Senior Officers. These officers are appointed by the State University of New York Board of Trustees.

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The State University strongly supports the goals behind this initiative of the Commission. Yet while there remains no support in the record for implementing these requirements for governmental and not-for-profit licensees such as the State University, the issues of potential breach and the risk of the University's future leadership being unwilling to risk their private information (where even the last four digits of a social security number can lead to stolen identity and fraud), the skewing of data when combining commercial and non-commercial data, and the potential violation of the Privacy Act in requiring such data, remain. We again urge reconsideration.

Respectfully submitted,

STATE UNIVERSITY OF NEW YORK

Joseph B. Porter
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June 13, 2016