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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

January 29, 2001

By Hand

Ms. Magalie Roman-Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: OMD Docket No. 00-205 / In the Matter of
Adoption of a Mandatory FCC Registration Number

Dear Ms. Salas:

We are transmitting herewith for filing with the Commission an original and four copies of Reply Comments of The Walt Disney Company and its subsidiary, ABC, Inc., in OMD Docket No. 00-205.

If there are any questions in connection with the foregoing, please contact Townsend Davis at 212-456-6855.

Respectfully submitted,

Lawrence R. Sidman

Lawrence R. Sidman

Enclosures

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Adoption of a Mandatory
FCC Registration Number

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OMD Docket No. 00-205

REPLY COMMENTS OF THE WALT DISNEY COMPANY

Sam Antar, Vice President
Townsend Davis, Senior Counsel

The Walt Disney Company
1150 17th Street NW
Washington, D.C. 20036

ABC, Inc.
77 West 66th Street
New York, New York 10023

January 29, 2001

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Adoption of a Mandatory) OMD Docket No. 00-205
FCC Registration Number)
)
To: The Commission

REPLY COMMENTS OF THE WALT DISNEY COMPANY

The Walt Disney Company (“TWDC”), on behalf of itself and its subsidiary ABC, Inc. (“ABC”), submits these reply comments in further response to the Commission’s request for comment on adoption of a mandatory 10-digit FCC registration number (“FRN”).¹

Argument

ABC has encountered two additional concerns about the Commission’s proposal to make the use of FRNs mandatory for all electronic filings involving fee payment (“Proposed Rules”):

1. Separate FRNs Used by the Same Entity:

ABC’s recent experience with the Wireless Bureau’s ULS system indicates that the proposal to allow an entity to have separate FRNs for subsidiaries, sub-agencies, customer or clients (Proposed Rules ¶ 14) is already in effect. ABC recently found it necessary to denote separate business divisions (e.g., television, radio) through extenders

¹ OMD Docket No. 00-205, Report No. FCC 00-421, released December 15, 2000 (“Proposed Rules”).

(known as subgroup identification numbers or SGINs) of certain ABC, Inc. Tax Identification Numbers (TINs). Last week, we were informed by CORES that each SGIN has automatically been converted into a unique FRN, thereby forcing an entity needing multiple SGINs to have multiple FRNs. ABC does not oppose this practice, as long as a parent company (which has one FRN) is able make payments on behalf of each of its divisions and subsidiaries. As we noted in our initial comments, the regulatory fee payment system thus far does not appear to be designed to process such payments in a way that will allow such a payment to be credited to each subsidiary.

2. Security Concerns of Uniform Use of FRNs:

The National Association of Broadcasters (NAB) filed an initial comment addressing the Proposed Rules in which it urged the Commission to “assess its electronic filing and database systems on a holistic level” and suggested that a broadcast licensee refer to one common identifier (an FRN or some other number) when submitting an application. Comments of NAB, at 4-5. ABC agrees that electronic filing systems should be integrated as much as possible, but we are concerned that using a single reference number for all filings raises significant security concerns.

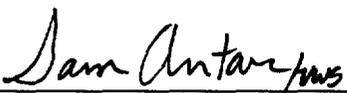
Currently, each FRN is linked to a single password. But each bureau of the Commission has a separate account system within which applications are prepared. Thus, if the same FRN is required as the access key for every bureau account, the same password would provide access to all of a company’s accounts, licenses, and applications. This broad level of access is problematic because of the widespread practice among broadcasters to use outside consultants and contractors who must be given access to certain accounts to input data into applications. For security reasons a

broadcaster with numerous FCC licenses, such as ABC, needs to restrict access by those outside consultants and contractors to specific account areas and applications, rather than granting them access to each and every license and application under the same FRN. Combining accounts under a single identification number and password does not provide adequate security to licensees.

Conclusion

For the reasons set forth above, TWDC respectfully submits that the Commission should not adopt the Proposed Rules until the concerns addressed in this reply are addressed.

Respectfully submitted,

By: 
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Law & Regulation
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