

I believe the FCC should attempt to determine what value, if any, that the radio broadcaster Public File requirements of the FCC serves the public and radio's listeners. It is my belief that there is no value. The following is offered:

- A significant expenditure of time and effort is experienced by the industry in complying with the FCC requirements for Public File maintenance,
- In 28 years of radio industry management I'm not aware of any instances in which a Public File for a licensee I've been associated with has received a request/review by a member of the public,
- I have been involved in a license challenge in the early 1990's during which no one from the public requested access to the licensee's Public File despite encouragement to do so,
- The only review of Public Files that I am aware of is by representatives of the FCC,
- It's time for the Public File to go the way of Ascertainments; as the environment changes so must the industry,
- On the subject of public service, it is my belief that there is no medium that places more emphasis on serving the public in a given locale than radio broadcasting; the Public File is not necessary to demonstrate this commitment to the needs of the public, particularly when considering the cost to do so and the lack of public interest in the File.