

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Standardized Program Reporting	)	
Requirements for Broadcast Licensees	)	MM Docket No. 11-189
	)	
To: The Commission	)	

**JOINT COMMENTS OF PUBLIC TELEVISION LICENSEES**

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## **SUMMARY**

A group of public television licensee clients of the law firm of Schwartz, Woods & Miller (Joint PTV Parties) herewith submits comments in response to the Commission's Notice of Inquiry contemplating adoption of a standardized disclosure regime that would apply to the broadcast industry.

The Joint PTV Parties urge the Commission to exempt CPB-qualified public television licensees from the proposed reporting regime. The entire thrust of the Commission's proposal is directed at the commercial television industry and appears designed to accommodate researchers, academics and others whose interest lies in assessing commercially-produced issue-responsive programming and who may have no connection to a particular licensee's service area. The proposal consequently is ill-suited to public television. It entirely ignores the very substantial differences between commercial and CPB-qualified noncommercial licensees. It is based on the faulty premises that such licensees: 1) do not air substantial amounts of issue responsive programming; 2) are not fully accountable to their audiences; or 3) do not provide the public with the tools needed to assess their public interest programming and activities. As detailed herein, there is substantial information regarding every CPB-qualified licensee's efforts to provide issue-responsive programming that is readily available to the public within the current regulatory scheme.

The flaws in the sample reporting form proffered by the Commission merely confirm that application of the standardized reporting regime to CPB-qualified stations is inappropriate, unnecessary and unwise. As with its

predecessor Form 355, the proposed form is clearly directed at commercial licensees. More importantly, the proposed reporting categories ignore the reality of the operations of CPB-qualified public television stations, reflect a biased view of what constitutes issue-responsive programming, entail confusing overlapping categories, devalue non-local programming as a measure of a licensee's responsiveness to its audience, effectively establish the government's view of what constitutes acceptable or at least preferred issue-responsive programming and ultimately require submission of information of limited utility at a substantial cost of licensee resources.

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Board of Regents of the University of Oklahoma/Rogers State University, Capital Community Broadcasting, Inc., Maryland Public Broadcasting Commission, Mid-South Public Communications Foundation, Oregon Public Broadcasting, San Mateo County Community College District, The Public Broadcasting Foundation of Northwest Ohio, Twin Cities Public Television, Inc., West Tennessee Public Television Council, Inc., WHYI, Inc., and WXXI Public Broadcasting Council (Joint PTV Parties)<sup>1</sup> file these comments in response to the Commission's Notice of Inquiry (NOI) in the above-referenced proceeding seeking comment on a proposal to replace issues/programs lists with a standardized disclosure form that would be available to the public online. In support thereof, the following is shown:

**INTRODUCTION**

1. The Joint PTV Parties include nonprofit community group, state authority, and institution of higher education licensees. The governmental units are expressly chartered by law to provide a noncommercial educational program service. The local organizations are all organized to provide a noncommercial

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<sup>1</sup> A listing of the Joint PTV Parties showing all of their broadcast stations is attached as Appendix A.

educational program service and, as required by the Commission, have governing boards that are representative of their communities. All of these licensees are qualified for grants by the Corporation for Public Broadcasting (CPB). The nongovernmental licensees by law must therefore maintain Community Advisory Boards.<sup>2</sup> Those boards advise the governing body of the station with respect to whether the programming and other policies of the station are meeting the specialized educational and cultural needs of the communities served by the station. Moreover, in addition to their local programming efforts, almost all of the Joint PTV Parties are members of the Public Broadcasting Service (PBS) and provide substantial quantities of PBS programming to their audiences. In short, the mission of these stations is to provide programming responsive to community needs, and they provide a wealth of programming in furtherance of that mission. There is no tension between the Joint PTV Parties' mission and their public service obligations.

2. The premises underlying the proposed standardized disclosure form are faulty, at least as they apply to public television licensees qualified for CPB funding. Many of the Joint PTV Parties participated at an earlier stage of this proceeding, successfully seeking reconsideration of the Commission's earlier adoption of Form 355. They noted that the Commission had not found any problem regarding levels of issue-responsive programming provided by public television licensees. They also noted that the form as constructed was directed to commercial operations and did not meaningfully accommodate public television operations.

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<sup>2</sup> 47 U.S.C. Section 396(k)(8).

3. Now, once again, the Commission proposes to apply standardized reporting to public television broadcasters in the absence of any finding that such broadcasters: 1) do not air substantial amounts of issue responsive programming; 2) are not fully accountable to their audiences; or 3) do not provide the public with the tools needed to assess their public interest programming and activities.

4. The Commission's preliminary conclusion that standardized detailed reporting requirements should be adopted for commercial and public television licenses alike is not based on any demonstrated need. The Joint PTV Parties urge the agency to exempt CPB-qualified public broadcast licensees from the application of any form that is adopted, as it has wisely done for children's television reporting. The Commission stresses the theoretical benefits of a standardized disclosure form and claims that inconsistency in issues/programs lists preparation prevents meaningful assessment of licensees' public service programming efforts. However, even without the availability of programming information through other sources, the current rule governing these lists amply protects the interest of a particular station's viewing audience in determining whether or not the licensee is providing adequate issue-responsive programming. In sum, the Commission's proposal notably omits any factual finding whatever that there is an actual problem with the level of public service or public responsiveness by public television licensees, much less a problem that justifies the burdensome requirement that has been proposed in an environment

that has challenged public television licensees to maintain current levels of programming.<sup>3</sup>

5. Indeed, to the extent there is any real rationale advanced, the entire thrust of the proposal is designed to accommodate researchers, academics and others who may have no connection at all with a particular licensee's service area and whose interest is focused on the performance of commercial broadcast licensees. Accordingly, the proposed form is clearly geared toward the routine operations of commercial television broadcasters, which have little in common with the public television industry. The deficiencies of the proposed reporting form for eliciting information from CPB-qualified public television stations underscore the fact that the proposed reporting regimen should not be applied to such public television licensees.

6. Like many industries, for-profit and non-profit alike, the public television industry has faced extraordinary financial challenges following the deep recession of 2008. While industry licensees rely on a mix of federal, state and private funding for their operations, the fact is that state funding overall has been dramatically cut and the ability to raise funds from the public has been extremely difficult in the current environment. Every one of the Joint PTV Parties has been forced in this climate to lay off staff; in some cases these layoffs have been

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<sup>3</sup> To the extent that there is an access problem because information is maintained in paper form and requires physical access by the public to the licensee's public file, this issue is being addressed by the Commission in its related proceeding contemplating mandatory online posting of licensees' public files. In this regard, the Joint PTV Parties note the Commission's outstanding proposal to require online posting of licensees' public files (Further Notice of Proposed Rulemaking, MM Docket Nos. 00-168 and 00-44), and they support the Comments of the Association of Public Television Stations and PBS filed therein that generally endorse the concept. Online availability of licensees' programming information, including issues/programs lists, would address a key access issue in the instant proceeding.

dramatic in scope. Nonetheless, they are to a station fighting to maintain local programming at the highest possible level.

7. While the Commission has not acknowledged it, apart from the current program reporting requirements applicable to public broadcast licensees, there is substantial information regarding every CPB-qualified licensee's efforts to provide issue-responsive programming readily available to the public. In particular, to the Joint PTV Parties' knowledge, every such public broadcast licensee today maintains a web site with extensive schedule information regarding all of its programming. In many cases, particularly with respect to documentaries, such as *Frontline* and *Independent Lens*, and local public affairs programming, that information includes topics, guests and summaries. News oriented series are highlighted on the PBS website (which is linked from each member station's website) and generally provide detailed information on individual programs and program segments, as well as links to video replays and transcripts. To a large extent, PBS programming is now presented seamlessly with web components and enhancements. For a prime example, see the information available for the premier nightly news program, *PBS NewsHour*, [www.pbs.org/newshour](http://www.pbs.org/newshour), including segment topics for past programs, full video, transcripts, updates, and further information. When these resources are combined with local media publicity and promotion of broadcast programming generally and with the current issues/programs list requirements, all of the information regarding a public television licensee's programming efforts that any interested party may reasonably wish to examine for whatever reason is readily available.

EXEMPTION OF PUBLIC TELEVISION LICENSEES FROM THE  
PROPOSED PROGRAMMING REPORTING REQUIREMENTS IS WARRANTED

8. The Commission's premises for the need for standardized disclosure are variously stated as "the need to empower citizens to ensure that broadcasters serve their communities,"<sup>4</sup> enabling the public "to play a more active role in helping a station meet its obligation to provide programming that addresses the community's needs and interests",<sup>5</sup> to "improve broadcaster accountability to the public. . . [which] will minimize the need for government involvement in monitoring how broadcasters comply with their public interest obligations."<sup>6</sup> In these circumstances, the Commission believes that the only solution to these alleged problems of access, public assessment of programmatic efforts and consistency is adoption of a standardized form that will require substantial staff resources at the expense of local programming efforts. The Commission's preliminary conclusion that public broadcast stations must be treated in the same manner as their commercial counterparts ignores the fundamental distinction between the two classes of licensee. The facts are that CPB-qualified public television broadcasters by their very nature provide and document ample amounts of issue-responsive programming and there is no dearth of readily available public information regarding that programming.

9. Virtually all of the Joint PTV Parties are PBS members. Most of the stations broadcast the entire PBS primetime schedule on their primary digital channels, supplemented by programs from American Public Television, National Educational Telecommunications Association, BBC Worldwide and other

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<sup>4</sup> NOI at para. 7.

<sup>5</sup> NOI at para. 10.

<sup>6</sup> Ibid.

sources. Some licensees with service areas that overlap those of other public television stations broadcast a complementary schedule that includes substantial PBS programming as well as other noncommercial educational programming. Without exception, these stations broadcast very substantial amounts of issues-oriented programming. It is no secret that while the commercial network affiliates are broadcasting advertiser supported entertainment fare (which certainly fills a public demand), PBS member stations are broadcasting signature national cultural and issues programming that is well known to the public and, we assume, to the Commission. The handful of non-PBS stations that are CPB-qualified similarly broadcast substantial amounts of national and local issue-responsive programming.

10. The public television program lineup includes *PBS NewsHour*, a weeknightly in-depth news program; *Washington Week*, a weekly summary of national news; *BBC World News*; *Moyers & Company*; *Charlie Rose*, a probing interview program; *Nightly Business Report*; *Frontline* news documentaries; *Nova's* exploration of science and nature; *Independent Lens* documentaries; *Religion and Ethics Newsweekly*; *Tony Brown's Journal*, public affairs documentaries with interviews of special interest to the African-American community; and others. These programs are uninterrupted by commercials. The news programs do not incorporate promotions for entertainment shows. Many of the programs air in primetime. They often are rebroadcast and made available online to encourage maximum viewership. There can be absolutely no doubt that these offerings taken together provide ample amounts of programming that address issues of concern to each licensee's viewers.

11. In addition to the unique national program fare noted above, some stations cooperate to produce statewide or regional public television issue programming. All of the Joint PTV Parties produce local issue-oriented public television programs for their discrete audiences. They do so in the context of the extraordinarily severe financial stresses occasioned by the recent economic downturn.

12. In sum, commercial and public television each fill vital roles in the nation's communications, but the nature of public television is that it is fundamentally committed to providing public interest programming and there is no lack of public communications as to what it does. Public television's non-profit educational mission is entirely different from that of its commercial counterpart, yet the Commission's rationale set forth in the NOI for the imposition of the extraordinarily detailed new reporting requirements did not consider at all these substantial differences. Public television licensees are subject to entirely different eligibility standards than commercial broadcasters. Licensing turns on a showing that the station will be "used primarily to serve the educational needs of the community, for the advancement of educational programs, and to furnish a nonprofit and noncommercial service."<sup>7</sup> Other than governments and schools, an applicant for a public television authorization is eligible only if the applicant's leaders are representative of a broad cross section of community elements.<sup>8</sup> These distinctive elements in the eligibility and mission of public television broadcasters form the basis for myriad logical regulatory distinctions. For example, public broadcasters, which are locally oriented, are not subject to the

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<sup>7</sup> See Section 73.621.

<sup>8</sup> See Form 340, Section II, Item 3 and accompanying Worksheet #2.

multiple ownership rules.<sup>9</sup> There are separate public file rules reflecting the varying operations of public and commercial stations.<sup>10</sup> There are starkly different rules governing on-air announcements of program support.<sup>11</sup>

13. It is instructive to recall how the Commission in analogous circumstances went about fashioning a remedy for the lack of educational and informational children's programming after the Children's Television Act of 1990 was enacted. That Act requires the Commission to review in connection with license renewal applications the extent to which noncommercial as well as commercial licensees have served the special program needs of children.<sup>12</sup> After compiling a record, the Commission found in implementing the Act that public television licensees should not be subject to reporting requirements on children's television because of their manifest service in the area and the unjustified cost of compliance. When it subsequently tightened the children's programming rules for analog television, the Commission determined that:

We will continue to exempt noncommercial television licensees from children's programming reporting requirements, see Memorandum Opinion and Order, 6 FCC Rcd at 5101, and we will also exempt them from the other public information initiatives we adopt today. In light of Congressional intent to avoid unnecessary constraints on broadcasters, and in view of the commitment demonstrated by noncommercial stations in general to serving children, we believe it is inappropriate to impose reporting obligations on such stations. *Id.* We nonetheless encourage noncommercial stations voluntarily to comport with these initiatives to the extent feasible as a means of providing parents and other members of the public with additional information about the availability of

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<sup>9</sup> See Section 73.5555(f).

<sup>10</sup> Cf., Sections 73.3526 and 73.3527.

<sup>11</sup> Cf., Sections 73.1212 and 73.621(e).

<sup>12</sup> Children's Television Act of 1990, Pub. L. No. 101-437, 104 Stat. 996-1000, codified at 47 U.S.C. §§ 303a, 303b, 394, see Sec. 303b(a).

children's educational and informational programming on all broadcast stations.

*In the Matter of Policies and Rules Concerning Children's Television Programming*, 11 FCC Rcd 10660, (1996), fn. 119.

14. As noted above, each of the Joint PTV Parties posts its program schedules and related information on its website. That is the industry norm and, to the Joint PTV Parties' knowledge, uniform practice. Anyone with Internet access, which today is widespread, can review listings of current programming and, generally, programming for at least the past two calendar quarters.<sup>13</sup> Licensees also commonly make available program guides with detailed program information to their members.

15. So the facts with respect to public television are that CPB-qualified public television stations (1) are chartered and required to provide educational programming, (2) broadcast tremendous amounts of national, regional, and, within their budgets, local issue-oriented programming, including news, public affairs, and other information programming serving broad and specialized audiences, and (3) broadly disseminate information on and documentation of this programming to the public. The Commission ignores these facts when it concludes that standardized reporting will facilitate access to information, make broadcasters more accountable or palpably improve the public's ability to review a public broadcaster's public interest programming and activities.<sup>14</sup>

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<sup>13</sup> See [http://www.pbs.org/stationfinder/stationfinder\\_relocalize.html](http://www.pbs.org/stationfinder/stationfinder_relocalize.html).

<sup>14</sup> NOI at para. 35.

THE PROPOSED REPORTING FORM IS FUNDAMENTALLY FLAWED  
AS APPLIED TO PUBLIC BROADCASTERS

16. While the Joint PTV Parties urge the Commission to exempt CPB-qualified public broadcasting licensees from any new standardized disclosure requirements, they have nonetheless reviewed the new suggested quarterly report form created by the Public Interest, Public Airwaves Coalition (“PIPAC”) and proffered by the Commission.<sup>15</sup> That review underscores their position that the proposed form is unnecessary for such licensees. As with its predecessor, the new form is clearly directed at commercial broadcasting. More importantly, the proposed reporting categories ignore the reality of the operations of CPB-qualified public television stations, reflect a biased view of what constitutes issue-responsive programming, entail confusing overlapping categories, devalue non-local programming as a measure of a licensee’s responsiveness to its audience, effectively establish the government’s view of what constitutes acceptable or at least preferred issue-responsive programming and ultimately require submission of information of limited utility at a substantial cost of licensee resources.

17. Initially, the PIPAC form seeks basic information regarding a licensee’s “most recent Form 323 (Ownership Report)” and “most recent Form 398 (Quarterly Children’s Television Report).” Neither of these applies to public television broadcasting. As a substantive matter, the three proposed categories of “local news,” “local civic/governmental affairs” and “local electoral affairs” are inherently overlapping. Moreover, they evince a basic disregard for any number of other topics that are worthy of coverage by any local television licensee in response to local needs and interests as well as a cardinal means used by public

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<sup>15</sup> NOI at para. 25.

broadcasting – national news and public affairs programming – of addressing them. So, for example, the category of “local news”, defined as “programming that is locally produced and reports on issues about, or pertaining to, a licensee’s local community of license,”<sup>16</sup> ignores the reality of public television operations and is obviously aimed at commercial broadcasters that as a group provide regular local news programs. With some exceptions, while public television licensees do provide news in one way or another, they do not have local news programs like those of their commercial counterparts. Such programs are simply too costly for most stations to produce on a non-advertiser-supported basis. It would be impossible for most local public television licensees to compete head-to-head with the multiple daily local news programs provided by commercial network affiliates. In fact, licensees such as the Joint PTV Parties do compete with their commercial counterparts and do provide issue-responsive content through signature national news programs and other such programming. The proposed form ignores this reality and thoroughly disregards the fact that national news stories are frequently responsive to local problems and interests.

18. Apart from the overlap among the categories of “local civic/governmental affairs,” “local electoral affairs” and “local news”, the thrust of the “local civic/governmental affairs” category is to prod licensees to provide coverage of the various activities of elected or appointed officials and undefined “relevant policy experts”. While the Joint PTV Parties agree that such coverage may well be desirable, they disagree with the implication in the form that these activities

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<sup>16</sup> NOI at para. 27.

are necessarily preferable in every licensee's case as indicia of a licensee's provision of issue-responsive programming.

19. The Joint PTV Parties likewise disagree that the proposed requirement to report the number of hours of programming provided with closed captioning or video description and to justify non-captioned programming is either necessary or warranted.<sup>17</sup> The putative premise for this proposed requirement – that those reliant on closed captioned programming have difficulty finding it<sup>18</sup> – is belied by reality. Television program schedules routinely include this information with respect to programming. Websites like those of the Joint PTV Parties likewise include this information, and they have every incentive to promote the availability of closed captioning in their offerings.

20. As the agency observes,<sup>19</sup> virtually all programming today is closed captioned. There is absolutely no evidence that the television broadcast industry generally or the public television industry in particular has disregarded its collective obligations in this area; in fact the broad availability of closed captioning noted by the Commission is testimony to the broadcast industry's adherence to its public service obligations. Yet the effective emphasis of the NOI in this area is to focus on broadcasters' decisions with respect to small amounts of non-captioned programming. Contrary to the Commission's assumption,<sup>20</sup> tracking and reporting of non-captioned program fare would indeed be a burden to the extent that it requires substantial staff time. There is an extensive regulatory

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<sup>17</sup> NOI at para. 30.

<sup>18</sup> Ibid.

<sup>19</sup> NOI at para. 31.

<sup>20</sup> Ibid.

regime, including a complaint process, in place to regulate this area. That regime is sufficient to address any real problems.

21. Moreover, the Joint PTV Parties take issue with the proposal advanced by PIPAC<sup>21</sup> that licensees report just how they comply with closed-captioning requirements by indicating the type of captioning they utilize. The Joint PTV Parties query whether this proposal is a precursor to the adoption of mandates regarding specific means of closed captioning. To the extent that licensees comply with the current rules, further examination of their means of compliance through this reporting mechanism is unnecessary and uncalled for.

22. Similarly, the proposed requirement<sup>22</sup> to report on licensees' video description efforts for the vision impaired is inappropriate. The Commission's recently adopted rules in this area apply limited requirements to but 100 stations, none of which are public broadcast outlets. Inasmuch as the Commission may not take action against any other licensee for failure to provide such services, the reporting requirement appears to be regulation "by raised eyebrow", an attempt to indirectly pressure licensees not subject to any requirement at this time into providing a service that is nowhere required. At the same time, it should be noted that the Joint PTV Parties, through PBS, have been prime developers and supporters of video description services. There is no real benefit to requiring television broadcasters to undertake the substantial burden of tracking and reporting this information

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<sup>21</sup> ibid.

<sup>22</sup> NOI at para. 32.

23. Finally, with respect to the proposal to require reporting of emergency accessibility complaints<sup>23</sup>, the Joint PTV Parties note that, as in the case of closed captioning, there is an extensive regulatory regime in place that governs emergency broadcasting and that the Commission is in the process of a major transition in its emergency alert system. Toward the latter end, it recently conducted a national test to determine the extent and scope of any problems, including that of disabled persons' access to emergency programming. It seems likely that the results of this and future anticipated tests will reveal whether there are any major problems in this area. The Joint PTV Parties observe further that there is in place a clear procedure for consumers to complain that an individual licensee has violated the rules regarding access to emergency programming. The Joint PTV Parties do not know how many complaints have been filed via this process, but submit that Commission disclosure of this information would be helpful in determining whether there is in fact an industry-wide compliance problem. In the absence of any evidence of such a problem, a reporting requirement is unwarranted.

THE COMMISSION'S PROPOSALS REGARDING POSSIBLE COMPOSITE BROADCAST WEEK  
AND PROGRAM SEGMENT REPORTING ARE FLAWED

24. Despite the fact that they believe that whatever form might be adopted should not be applied to CPB-qualified public television stations, the Joint PTV Parties have reviewed the Commission's suggestions regarding program reporting<sup>24</sup>. That review compels the conclusion that the proposed reporting regime is not suitable for CPB-qualified public television stations. While the

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<sup>23</sup> NOI at para. 33.

<sup>24</sup> NOI at paras. 14-21.

concept of a composite week is perhaps an improvement over the requirement adopted earlier in this proceeding, it nonetheless would present a problem for public television licensees to the extent that any designated days fall during their pledge periods. During those periods, designed to raise funds for station operations, licensees' program fare differs substantially from the normal weekly schedule and does not accurately reflect regular program service.

25. The Commission asks whether or not advance notice of a composite week reporting period should be afforded to licensees. While the Joint PTV Parties oppose a requirement for any such reporting, they observe that broadcasters' schedules are typically set weeks or even months in advance and are not routinely changed. The speculative suggestions<sup>25</sup> that advance notice of a requirement to report information would prompt "gaming the system" or "tainting the sample" presume are misplaced.

26. No review regime should require program segment reporting. As in the case of quarterly issues/programs lists, licensees need complete flexibility to report relevant programming in whatever format they deem appropriate to reflect their efforts. Requiring CPB-qualified public television licensees to compile segment-specific information on a regular basis, whether in connection with PBS-supplied fare or with other programs, would constitute an inordinate burden, necessitating additional staff time at the expense of other activities, including programming. The Joint PTV Parties challenge the assertions<sup>26</sup> that the Commission's oversight of licensees' issue-responsive programming obligations necessitates this level of detail generally or that national and local news stories

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<sup>25</sup> NOI at paras. 16-17.

<sup>26</sup> NOI at para. 21.

need to be segregated so as to fit into the designated categories of programming, apparently on the theory that national stories are unresponsive to local needs. This rationale is facially faulty and provides no basis for imposition of the detailed reporting requirement contemplated by the Commission. Indeed, as in other parts of the NOI, the interests being promoted by the more extreme reporting requirements seem to be those of academics, researchers and public advocacy groups rather than the individual viewer in any given community who certainly has the intelligence to choose the programming he or she wants and to complain when he or she sees a problem.

#### CONCLUSION

27. The Joint PTV Parties urge the Commission to reexamine the basis for the standardized quarterly reporting requirement proposed in the NOI in light of the distinctive and substantial public service offered by CPB-qualified public television licensees and the ready availability to the public of their programming information. The Commission should treat public television here just as it has with respect to children's television. Public television licensees by no means disclaim their public interest programming obligations. Rather, they so obviously discharge those obligations in an exemplary fashion that detailed reporting requirements are not required.

Respectfully submitted,

#### **JOINT PTV PARTIES**

BOARD OF REGENTS OF THE UNIVERSITY  
OF OKLAHOMA/ROGERS STATE  
UNIVERSITY

CAPITAL COMMUNITY BROADCASTING,  
INC.

MARYLAND PUBLIC BROADCASTING  
COMMISSION

MID-SOUTH PUBLIC COMMUNICATIONS  
FOUNDATION

OREGON PUBLIC BROADCASTING

SAN MATEO COUNTY COMMUNITY  
COLLEGE DISTRICT

THE PUBLIC BROADCASTING  
FOUNDATION OF NORTHWEST OHIO

TWIN CITIES PUBLIC TELEVISION, INC.

WEST TENNESSEE PUBLIC TELEVISION  
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January 27, 2012

JOINT COMMENTERS IN  
MM DOCKET NO. 11-189

BOARD OF REGENTS OF THE UNIVERSITY OF OKLAHOMA/  
ROGERS STATE UNIVERSITY

KRSC-TV, Claremore, Oklahoma

CAPITAL COMMUNITY BROADCASTING, INC.

KTOO-TV, Juneau, Alaska

MARYLAND PUBLIC BROADCASTING COMMISSION

WMPB(TV), Baltimore, Maryland  
WMPT(TV), Annapolis, Maryland  
WCPB(TV), Salisbury, Maryland  
WFPT(TV), Frederick, Maryland  
WGPT(TV), Oakland, Maryland  
WWPB(TV), Hagerstown, Maryland

MID-SOUTH PUBLIC COMMUNICATIONS FOUNDATION

WKNO(TV), Memphis, Tennessee

OREGON PUBLIC BROADCASTING

KOPB-TV, Portland, Oregon  
KEPB-TV, Eugene, Oregon  
KOAB-TV, Bend, Oregon  
KTVR(TV), LaGrande, Oregon  
KOAC-TV, Corvallis, Oregon

SAN MATEO COUNTY COMMUNITY COLLEGE DISTRICT

Station KCSM-TV, San Mateo, California

THE PUBLIC BROADCASTING FOUNDATION OF NORTHWEST OHIO

WGTE(TV), Toledo, Ohio

TWIN CITIES PUBLIC TELEVISION, INC.

KTCA-TV, St. Paul, Minnesota  
KTCI-TV, St. Paul, Minnesota

WEST TENNESSEE PUBLIC TELEVISION COUNCIL, INC.

WLJT-DT, Lexington, Tennessee

WHYY, INC.

WHYY-TV, Wilmington, Delaware  
WDPB(TV), Seaford, Delaware

WXXI PUBLIC BROADCASTING COUNCIL

WXXI-TV, Rochester, New York