

February 15, 2012

Mr. William T. Lake  
Chief, Media Bureau  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Dear Mr. Lake:

Re: Proposal for online political file requirement  
(MM Docket No. 00-168; MM Docket No. 00-44;  
MB Docket No. 11-189)

The Commission has proposed that television stations be required to post their political files on the FCC website. Various television stations have submitted comments to the FCC that detail the burdens involved in such a requirement -- burdens not evident to those unfamiliar with stations' political files and how orders for political time are processed in back-and-forth communications between buyers and stations. The Commission has shown concern about these burdens, while continuing to seek greater availability of political information to the public.

The undersigned station groups here submit a variant that they believe will reduce the burden on television stations, address other television station concerns, and yet effectively meet the Commission's objective of making more political information available to the public. In fact, they believe that their proposal would more effectively serve the Commission's objective than would the proposal contained in the Commission's Further Notice of Proposed Rulemaking.

Their proposal is:

1. The station would place online, either at a station website or the FCC's website (at the station's election), the following political file information:
  - the name of the buyer, the name of the candidate on whose behalf the political spots (or program material) were purchased and the entity, including officers, that paid for the spots (or program material);
  - the aggregate amount of money paid for the spots (or program material) by the buyer since the last online posting.

2. Generally, the online political file would be updated once a week. Immediately prior to an election, it would also be updated the day before the election. Outside the lowest unit charge period, the online political file would be updated once a month.
3. Existing FCC requirements for stations' local political files for purchase of political spots and political program material would remain the same.

The reason why this proposal would better serve the Commission's objective than requiring stations' paper political files to be placed online as the Commission has proposed is that the latter would not readily provide the public with statistics that show how much money was spent by each candidate on his or her candidacy. This alternative approach suggested here would simplify and consolidate the desired information, candidate by candidate.

Respectfully submitted,



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Mary Jo Manning on behalf of  
Barrington Broadcasting Co., Inc.  
Belo Corp  
Cox Media Group  
Dispatch Broadcast Group  
The E.W. Scripps Company  
Gannett Broadcasting  
Hearst Television Inc.  
Meredith Broadcasting Group  
Post-Newsweek Stations, Inc.  
Raycom Media, Inc.  
Schurz Communications, Inc.

cc: Chairman Genachowski  
Commissioner McDowell  
Commissioner Clyburn  
Zachary Katz  
Sherrese Smith  
Dave Grimaldi  
Erin McGrath  
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