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April 20, 2012

*Via Electronic Comment Filing System*

Chairman Julius Genachowski  
Commissioner Clyburn  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: In the Matter of Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations, MM Docket No. 00-168; and Standardizing Program Reporting Requirements for Broadcast Licensees, MB Docket No. 11-189

Dear Chairman Genachowski and Commissioner Clyburn:

I write to ask you to adopt the strongest and most comprehensive proposals that will expand public access to information about the programming and advertising that appears on local broadcast television stations around the country and provide some additional insight into the value of this information for the members of the United Church of Christ from the perspective of the United Church of Christ's Justice and Witness Ministries.

The United Church of Christ's members, like most people of faith, are highly active in civic life and the life of their communities. They care deeply about many important issues, drawing on the values we share as members of the UCC. The United Church of Christ Constitution states: "The United Church of Christ recognizes that God calls the whole church and every member to participate in and extend the ministry of Jesus Christ by witnessing to the Gospel in church and society." To effectuate that mission, the UCC's Justice and Witness Ministries seeks to aid and encourage our members to participate actively in the election cycle through our Our Faith, Our Vote program.

Our Faith, Our Vote offers resources to ensure our members participate as fully as possible in the elections within the bounds of the law. We emphasize the following four areas of action:

- Be Active - Get resources and inspiration for participating in the elections
- Be Aware - What will be on your ballot in November?
- Be Protective - Help us protect the most fundamental right - the right to vote.
- Be Civil - Resources for restoring civility to dialogue

God is still speaking,

In the past, as part of Our Faith, Our Vote campaigns, we have followed in the ground-breaking history the United Church of Christ's media justice ministry, OC Inc., to monitor the media during the election cycle. Monitoring the broadcast media helps individuals to better understand the candidates running for election and the issues for which they stand. In the past, media monitoring involved visiting television stations to review hard-copy files during business hours, or, keeping homemade tally charts of political programming covered by local television stations.

We are hoping to take advantage of your upcoming decision next week to enhance this year's effort by enabling our members to use the new, modern disclosures. We are disappointed to learn that all of our members may not benefit from the decision next week. In particular, I understand that you are considering only requiring network-affiliated stations in the top 50 television markets to disclose their political files. As you are no doubt aware, this limitation will leave out many important television stations, such as WGN in Chicago. Moreover, limiting disclosure to the top 50 markets will mean that many citizens, and many UCC members, will not have this information before the elections this fall.

For this reason, I am writing to ask you to adopt the complete online broadcaster disclosure obligation next week. In addition, I hope that you will heed UCC OC Inc.'s advocacy and quickly follow up the decision next week with a decision to with an order this summer to expand and improve the information in these files by creating a statistically-valid sample of television programming.

The United Church of Christ's governing body, the General Synod, has adopted many resolutions over our 50 year history supporting civic engagement, campaign finance reform and communications accountability and justice. In adopting these resolutions, we heed the Biblical injunction of Deuteronomy 16:19-20, "You shall not pervert justice, you shall not show partiality, and you shall not take a bribe ... justice, and only justice, you shall follow ...." I hope that you will take action to permit our members to uphold their values and this injunction during the upcoming election.

Sincerely,

Justice and Witness Ministries  
United Church of Christ