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July 16, 2012

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VIA ECFS

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

***Re: Standard and Enhanced Disclosure Requirements for Television
Broadcast Licensee Public Interest Obligations, MM Docket No. 00-168;
Extension of the Filing Requirement for Children's Television
Programming Report (FCC Form 398), MM Docket No. 00-44***

Dear Secretary Dortch:

The Radio Television Digital News Association ("RTDNA")¹ hereby submits these comments in support of the Petition for Reconsideration filed by the Television Station Group in the above-referenced proceedings.²

RTDNA is the world's largest professional organization devoted exclusively to electronic journalism, and its membership includes news executives in radio, television, and digital media. Its members are committed to providing accurate and credible news stories about a wide variety of issues of public importance, including campaign spending.

In its *Second Report and Order*, the Commission adopted a requirement that stations in the top 50 DMAs that are affiliated with the top four national television broadcast networks upload new political content to an online system (with other stations to follow after two years).³ The *Second Report and Order* states that "placing the political file online will enable candidates, as well as the public, journalists, educators, and the research community, to identify and investigate those sponsoring political advertisements."

¹ Formerly the Radio-Television News Directors Association ("RTNDA").

² Television Station Group, Petition for Reconsideration, *Standard and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, MM Docket Nos. 00-168, 00-44 (filed June 11, 2012) (the "*Petition for Reconsideration*").

³ *Standard and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Second Report and Order, FCC 12-44, 77 Fed. Reg. 27631 (rel. April 27, 2012) ("*Second Report and Order*").

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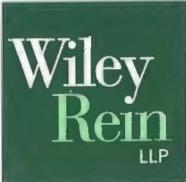
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As a preliminary matter, RTDNA wishes to make clear that regulating broadcasters in the name of assisting academics, researchers, and journalists is beyond the purview of the Commission. To the extent the Commission's proposed rules governing an online political file can find firm legal footing, however, RTDNA does believe that the alternative proposal set forth by the Television Station Group in its *Petition for Reconsideration* will provide journalists with far more relevant information in a more accessible format than the disclosure mandated by the *Second Report and Order*.

We have heard from some of our members whose news organizations have tried to use existing broadcast political files as a resource to analyze political spending that the files are voluminous, contain extraneous information, and require the devotion of extensive resources to detect patterns or to aggregate useful information. The proposal by the Television Station Group, on the other hand, would allow broadcasters to comply with the Commission's rules by uploading information to the political file that would prove more useful to reporters covering money and politics. By aggregating information about dollars spent, participating stations would provide journalists with the information they are most likely to need in a readily digestible format. Additionally, by including information about advertising pertaining to state and local issues, the Television Station Group proposal would cover a broader range of issues that are likely to affect viewers in our members' communities. Other political file information that is less likely to be helpful for journalists would remain available for review at the station, thus expanding the usefulness of online political files without restricting access to any currently available information.

Importantly, the Television Station Group proposal is opt-in only, meaning that stations lacking the infrastructure to aggregate data would not be forced to do so. This is critical for news departments in many stations at which any additional regulatory costs could be offset by corresponding cuts to the news department budget.

RTDNA certainly has no problem with efforts to improve transparency—in fact one could say transparency is among the organization's core values. But simply moving television station political files online, without addressing the actual information contained therein, will do little to shed light on the important issue of political campaign expenditures. By enhancing the information contained in political files,



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not just expanding their availability, the Television Station Group proposal offers a reasonable alternative that will strengthen the ability of electronic journalists to inform the electorate.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathleen Kirby".

Kathleen A. Kirby
Ari S. Meltzer
Counsel to RTDNA