

To: FCC Public Comments **MB Docket No. 12-106**

**July 19, 2012**

I'm writing with concerns about MB Docket No. 12-106. I strongly agree with the wording of the University Station Alliance and paraphrase their excellent work.

I am strongly opposed to the proposed change in rules regarding third party fundraising on non-commercial stations. The current system of requesting and receiving an FCC waiver in emergency situations works because the FCC has proven to be responsive to requests for relief-fundraising usually as the result of "catastrophic" events. Also, existing venues of public service announcements (PSA's) and news coverage address community needs. It is important that the FCC not make the change. Shifting the third-party fundraising protocol from extraordinary needs to ordinary needs would result in unintended consequences that create a negative station/licensee gatekeeper effect. By telling the community 88 hours of programming time is possibly up for grabs, entities desiring fundraising air-time could interpret FCC maximums for third-party fundraising as mandates. The criteria for air time would be from relief fundraising due to devastating events such as hurricanes, wide-spread flooding, tornadoes, and earthquakes, to ordinary fundraising. This change would create a competition among not-for-profits to gain access to air-time. If a station provides fundraising time for a non-profit entity, why not provide time for non-profit PAC?

The nation is struggling with the financial impact of "Citizen's United" as broadcasters, agencies and production houses reap the profits of that decision. I fear allowing uncontrolled third party fundraising will empower political organizations with strong agendas to another avenue of financing. This will continue to polarize the process of honest American debate.

The proposed change is especially problematic for institutional licensees. Stations licensed to and operated by universities, colleges, state agencies, and school systems could be pressured to fundraise for internal licensee needs. Competing licensee internal entities would want an equal share of fundraising time. The music department wants time, the art department wants equal time and of the dozens of entities on campus, which ones get the nod? Will it be the College of Engineering or the College of Arts & Sciences? Why would a station do more fundraising for other internal or external entities when the amount of time and the number of resources needed to produce fundraisers for stations that keep listeners to tuned-in is already difficult?

In addition, adding third-party fundraising would create a negative effect on the abilities of NCE's to raise funds for station operations because the station's audience could be asked frequently to support many third-party causes and they may assume the station was receiving some of the third-party revenue. This perception would potentially have a devastating effect on revenues of stations still struggling to recover from the current recession.

Fundraising for third-party non-profit organizations could cause additional audience tune-out factors due to pledge drive disruption and added audience fatigue, especially if audience members have no affinity for that organization. At a time when NCE's are competing for audience against a wide array of new media, stations can ill-afford to engage in any activity that drives away audiences. We understand that some NCE's might agree with this proposed change as it may allow them to be more interactive with their communities of license. However, the stresses placed upon them by entities wanting equal time for on-air fundraising will outweigh any benefits that would result. Also, the avenues of news reporting and Public Service Announcements (PSA's) already address community interests. NCE's provide significant service through many PSA's for community events, community civic projects, and community needs.

Therefore, the FCC should not relax the prohibition on third-party fundraising for NCE stations. The current system of requesting and receiving an FCC waiver in emergency situations works. Most stations owned by universities, colleges, state agencies, and school districts know the negative unintended consequences that will result if the rule is changed. I urge the FCC to reject this proposed change.

Thank you.

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