

MB Docket No. 12-106
Noncommercial Educational Station Fundraising
For Third-Party Non-Profit Organizations

COMMENTS OF STATION RESOURCE GROUP

In Docket 12-106, “Noncommercial Educational Station Fundraising for Third-Party Non-Profit Organizations”, the Commission asks whether noncommercial (NCE) radio and television stations should be allowed to routinely interrupt regular programming to conduct fundraising for the benefit of non-profit entities other than the station itself.

Station Resource Group (SRG) is a membership organization of leading public radio organizations. SRG’s 41 members operate over 220 noncommercial educational stations.

SRG member stations have undertaken numerous special fundraising efforts on behalf of other non-profit entities. They have done so by seeking and receiving Commission waivers permitting specific campaigns for local, national and global causes. These suspensions of regular programming to fundraise on behalf of other parties have been in response to extraordinary circumstances, from vast humanitarian crises following natural disasters to rescuing a cherished local cultural institution from threatened fiscal demise.

Most SRG members have found the Commission’s current approach to considering waivers of its general restriction on third party fundraising to be convenient, timely, and a minimal burden.

The Notice of Proposed Rule Making (NPRM) makes reference to Commission practices with respect to such waivers, as well as its in-depth reviews of NCE fundraising practices, and numerous other policy decisions it has implemented over the years to afford appropriate flexibility to NCEs. The NPRM states, however, that throughout this process there has been “a concern that these changes not adversely affect the educational programming mission or noncommercial character of these stations has persisted.”

SRG shares these concerns.

The NPRM notes that “the report on ‘The Information Needs of Communities’ (*INC Report*) recommended that the FCC consider affording noncommercial broadcasters more flexibility by allowing certain NCE stations to engage in fundraising for charities and other third-party non-profit organizations.” While this proposal was one of many concepts articulated during the Commission’s hearings on the information needs of communities, it was not raised by the public broadcasting entities that participated in those hearings.

SRG looks forward to comments in this proceeding by NCE licensees that advocate for these changes, so that we may learn why they believe there is a need for new policies.

Whatever the needs for new fundraising flexibility that may surface, SRG believes the proposed changes will obligate all noncommercial licensees, regardless of their interest in third party fundraising, to a range of new reporting obligations that will introduce new costs to their operations at a time when many stations are already facing significant financial pressure.

Submitted by Theresa R. Clifford and Thomas J. Thomas, co CEOs