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Re: MB Docket 12-106

Dear Secretary:

I am writing today to oppose proposed regulations that would permit NCE stations that do not receive CPB funding to be able to perform most fundraising for third parties.

By allowing NCE stations this latitude will open the doors for organizations, including broadcast licensees that have parent organizations that are not directly involved in broadcasting to use this time to raise funds that directly benefit their parent organizations. This completely undermines the educational purpose and self-sustaining mechanisms that are the current cornerstones of the NCE service.

In addition, since this would be limited to non-CPB funded stations, it would be at the discretion of the licensee which organizations will be permitted to get air time and with a majority of covered stations faith-based in nature, many organizations that support groups of minority groups will be excluded while other groups that call for the increased oppression of these minority groups will be supported and given a voice that other groups will be denied due to conflicts in the view of the licensee. I do not feel that it would be appropriate to have an "equal access" rule but instead, do not do it at all.

I do feel that exceptions should be put in place in the event of local or worldwide catastrophic incidents, whether man-made or natural. In the aftermath of the March 11, 2011 Great Tohoku Earthquake and tsunami disaster in northeastern Japan, REC's J1 Radio, an internet radio station not subject to FCC rules did an outreach to direct donations to the Japan Society of New York's relief fund. Not all disasters are global in nature, some are local or regional. The recent wildfires in Colorado left many people homeless and last weekend's massacre in Aurora left families without their loved ones.

I feel that there should be rules in place that allow a "trigger event" such as a strong earthquake, widespread fire, terrorist attack or other large scale criminal action (such as the Aurora shooting) would allow stations to be permitted to raise funds for organizations directly related to relief efforts in the aftermath of the trigger event. Such fundraising should be allowed before the FCC grants a local or blanket waiver however stations must inform the Media Bureau through informal process with details of the fundraising efforts and the organizations that are benefiting from the campaign.

By permitting many churches, mega-ministries and other organizations the ability to be licensed as “non-commercial educational” without having an accredited educational program, we are already stretching the scope of the NCE service well past the school-based service that it was originally founded on. There is no need to stretch it any more.

Currently in America, many groups including women, Muslims, immigrants and the gay, lesbian, bisexual, transgender and transsexual communities are under direct attack by some Commission licenses in the NCE sector. By permitting third-party fundraising, we are allowing these NCE stations to raise funds for related and unrelated organizations that will further violence against these oppressed groups while these oppressed groups are not able to raise funds for their own causes as they will be excluded by the licensee.

The much bigger problem here is NCE ownership and when a small number of entities such as Educational Media Foundation, Calvary Chapel of Twin Falls and American Family Association (the latter being an organization recognized as a “hate organization” by the Southern Poverty Law Center) have a significant control of “non-NPR” NCE licenses nationwide, the opportunities for fundraising under these regulations would be one-sided and biased and due to the current structure of licensees, would discriminate against non-faith based organizations.

With this, I ask that the Commission not permit third-party fundraising by NCE stations at this time.

Respectfully submitted,

A handwritten signature in blue ink that reads "Michelle (Michi) Eyre". The signature is stylized and cursive.

Michelle (Michi) Eyre
Founder, REC Networks