

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:)
)
Entercom Communications Corp.) RM-11684
Petition to Amend Section 73.1216)
Licensee-conducted Contests)

TO: The Secretary
ATTN: The Commission

**COMMENTS OF THE
ADVENTIST RADIO BROADCASTERS' ASSOCIATION**

The Adventist Radio Broadcasters' Association ("ARBA")¹ respectfully submits the following comments in support of the above-identified Petition for Rulemaking submitted by Entercom Communications Corporation concerning the Commission's regulations governing licensee-conducted contests found in §73.1216 of the agency's rules.²

Entercom proposes that the Commission amend its rule concerning the public disclosure of the terms of contests that broadcast licensees conduct. Presently, radio and television stations are required to disclose all the material terms of a contest by announcing them periodically on the air. Entercom proposes to give stations the option to post contest terms on their Internet websites (or to provide the disclosure in other written formats) in lieu of broadcast

¹ ARBA is an association of more than two dozen radio stations, both commercial and noncommercial, scattered throughout the United States, licensed to institutions and organizations associated with the Seventh-day Adventist Church.

² The Commission invited public comment on Entercom's Petition in its Public Notice, Consumer & Governmental Affairs Bureau Reference Information Center Petition for Rulemaking Filed, Report No. 2969 (Nov. 20, 2012).

announcements. ARBA believes that this is an eminently sensible proposal and asks the Commission to give it thorough consideration. Obviously, it is important for the audience and potential contestants to be informed about the terms of any contest offered for their participation. However, over-the-air announcements are certainly not the only means of reaching potential contestants, and perhaps not the best means.

Many ARBA member stations conduct on-air contests as an important element of developing bonds with their listeners. ARBA station personnel know from experience how difficult it can be to condense all of the material terms of a contest into a succinct listenable and brief announcement. These comments are primarily directed to the impact of this rule on radio stations because ARBA's members are involved exclusively in radio broadcasting.

It must be observed initially that the on-air reciting of material contest terms is often tediously boring to the point of turning off the audience, at least momentarily, if not to the point of inducing the audience to tune the receiver away from the station entirely. To avoid long attention-losing gaps, stations sometimes produce the disclosure notice with an announcing talking at high speed, sometimes to the point of incomprehension. The situation is further compounded by the fact that the environment for radio listening is often noisy and cluttered with many distractions. The underlying purpose of the rule – to inform the audience – has been completely obfuscated when the audience is not listening or is not able to comprehend the announcement. No practical programming purpose nor any public interest policy is being served by such legalistic compliance with an outmoded regulation.

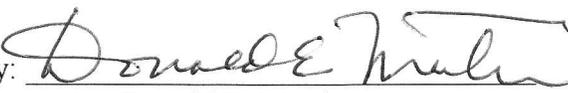
On the other hand, as Entercom pointed out, contemporary Americans are well versed Internet users. They are adept at finding almost any information they want or need instantly on

the Internet anywhere anytime with online access provided through desktop, laptop and mobile devices. If in promoting the contest, a station would invite listeners to review the contest rules on the station's website, most members of the audience in twenty-first century America would probably have a better chance of actually becoming familiar with the contest terms than has been the case with the presently required audio announcements. The rule's underlying purpose of ensuring a better informed public, and especially a better informed contestant corps, would be well served.

ARBA supports Entercom's proposal and asks the Commission to commence a rulemaking proceeding to consider and to implement it.

Respectfully submitted,

ADVENTIST RADIO
BROADCASTERS' ASSOCIATION

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Its Attorney

December 20, 2012

CERTIFICATE OF SERVICE

I, Donald E. Martin, hereby certify this 20th day of December, 2012, that I have caused a copy of the foregoing document to be served by United States first class mail upon the following:

John C. Donlevie, Esquire
Executive Vice President and General Counsel
Entercom Communications Corporation
401 City Avenue, Suite 809
Bala Cynwyd, Pennsylvania 19004

A handwritten signature in cursive script that reads "Donald E. Martin". The signature is written in black ink and is positioned above a horizontal line.

Donald E. Martin