



March 1, 2013

By Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Reply Comments of the Public Radio Regional Organizations
Promoting Diversification of Ownership in Broadcasting Services (MB Docket No. 07-294)

Dear Ms. Dortch:

The undersigned are the leaders of the four public radio regional organizations comprised of two hundred stations nationwide, whose purpose is to represent the views of our members on issues that impact local stations.¹ We write to oppose the Commission's proposal to require public radio licensee volunteer board members to obtain FCC Registration Numbers ("FRNs") generated based on the individual's Social Security Number ("SSN"). In doing so, we endorse the joint comments filed by National Public Radio (NPR), the Association of Public Television Stations (APTS), the Corporation for Public Broadcasting (CPB) and the Public Broadcasting Service (PBS) (hereinafter "National Public Broadcasting Organizations") on February 14, 2013.

Like the National Public Broadcasting Organizations, we support the Commission's overall goal of promoting diversity in broadcast ownership. However, collecting information on our member stations' governing boards will not provide the Commission with any insight into the "ownership" of public stations. Board members have no financial stake in stations, and many serve by virtue of having been elected or nominated through a local or state political or other selection process. Indeed, the stations' licenses are owned by nonprofit foundations, public and private colleges and universities, and even state governments, a fundamental difference from commercial broadcasting. In fact, combining demographic information obtained from public station governing bodies with that of commercial owners will likely produce an inaccurate picture of broadcast ownership in America today.

Furthermore, we are concerned that imposing the FRN requirement on public radio stations will discourage otherwise qualified individuals from participating in station governance.

¹ In addition to national representation by NPR, public radio stations are represented by four regional organizations: Eastern Region Public Media; Public Radio in Mid America; Western States Public Radio; and California Public Radio.

This impact will be particularly acute in rural areas, where population (and therefore the pool of qualified prospective board members) is more limited. The adverse impact will also be felt in major metropolitan areas by discouraging more nationally prominent individuals from volunteering to serve institutions holding public radio station licenses.

In sum, requiring volunteer public radio board members or trustees of state educational systems or other educational institutions to obtain individual FRNs will provide no insight into broadcast “ownership” but it will likely deprive public radio stations of the important experience and expertise such individuals have long provided to public broadcasting.

Accordingly, in support of the comments of the National Public Broadcasting Organizations, we urge the Commission not to impose the FRN requirement on public radio station licensees.

Sincerely,

Glenn Gleixner
General Manager, WVTF
President, Eastern Region Public Media

John Hess
General Manager, Boise State Public Radio
President, Western States Public Radio

Christina Kuzmych
General Manager, Wyoming Public Media
President, Public Radio in Mid America

Frank Lanzone
General Manager, KCBX
President, California Public Radio