



August 26, 2014

Chairman Tom Wheeler
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: DA 14-1149

Expanding Online Public File Obligations to Radio Licensees

MB Docket No. 14-127

Dear Chairman Wheeler,

On behalf of the National Federation of Community Broadcasters (NFCB) we would like to register our feedback in response to Public Notice #DA 14-1149.

The National Federation of Community Broadcasters (NFCB) is a national alliance of stations, producers, and others committed to community radio. NFCB advocates for national public policy, funding, recognition and resources on behalf of its membership, while offering services that strengthen community broadcaster's capacity for providing reliable and effective public service media to the American people. Our members are primarily Latino, Native American, African American and rural NCE stations.

NFCB queried over 400 of our members on the issue of online public file requirements and collated their responses. A brief summary of our feedback follows:

- As local institutions deeply embedded in community life and largely run by citizen volunteers, community radio is firmly committed to transparency in everything we do. The public "right to know" is a bedrock value in community radio. Our support for the public file is unwavering.

- As NCE licensees, our members cannot and do not accept funds from political candidates or organizations advocating on behalf of a candidate or political issue. Our understanding of the proposed order is that it is primarily a push to give all citizens and organizations access to political spending information. We fully support that notion but are not an appropriate audience to include in that effort. We think the issue is moot for NCE's.
- The majority of our member stations operate with a staff of 5 or less. Requiring them to post the public file online and maintain a hard copy public file creates a significant burden on organizations that are already doing too much with fewer resources.
- Reliable and affordable Internet and broadband access is an issue for our rural and Native American stations in a significant number of cases. Most of the stations in this category are also operating with a staff of 5 or less. The access issues only add to the burden.

In summary, given the points listed above, we would respectfully ask the following:

- That the FCC allow NCE stations to continue to maintain a physical public file rather than requiring them to make the file available online.
- That in the event the FCC determines that all stations, including NCE stations, must post the public file on the internet, the commission provide stations as much time as possible to make the transition. Furthermore, we would request that the online file replace the physical file as it would be redundant and require even more staff hours to maintain both.
- That the Commission considers an exemption for those stations with 5 or less employees as has already been done with regard to the EEO requirements. We believe that a precedent has already been set in this regard and that it acknowledges the burdensome effect of these types of regulations on organizations of a certain size.

Thank you for your time and attention in this matter and thank you for the opportunity to submit our feedback.

Respectfully,

A handwritten signature in black ink that reads "Sally Kane". The signature is written in a cursive, flowing style.

Sally Kane, CEO National Federation of Community Broadcasters

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