

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Parts 74, 76 and 78 of the Commission’s Rules Regarding Maintenance of Copies of FCC Rules)	MB Docket No. 17-231
)	
Modernization of Media Regulation Initiative)	MB Docket No. 17-105

**COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

I. INTRODUCTION AND SUMMARY

The National Association of Broadcasters (NAB)¹ hereby responds to the above-captioned Notice concerning the Commission’s proposal regarding maintenance of hard copies of FCC rules.² This is the first rulemaking proceeding stemming from the FCC’s media modernization initiative, and NAB appreciates Chairman Pai’s commitment to initiating at least one rulemaking each month, for the foreseeable future, to modify or eliminate unnecessary or unduly burdensome regulations.³ In this proceeding, NAB supports the

¹ NAB is a nonprofit trade association that advocates on behalf of free local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² Notice of Proposed Rulemaking, FCC No. 17-121, MB Docket Nos. 17-231 and 17-105 (*rel.* Sept. 26, 2017) (Notice).

³ Ajit Pai, *Modernization Month at the FCC*, FCC.gov (Sept. 7, 2017), <https://www.fcc.gov/news-events/blog/2017/09/07/modernization-month-fcc>.

proposal to eliminate rules that require broadcast entities to maintain paper copies of Commission regulations.⁴

II. NAB SUPPORTS THE PROPOSAL TO ELIMINATE RULES THAT REQUIRE BROADCAST ENTITIES TO MAINTAIN PAPER COPIES OF COMMISSION REGULATIONS

Certain broadcast entities are currently required to maintain hard copies of FCC rules. Under 47 C.F.R. § 74.769, low power TV, TV translator and TV booster stations must “have a current copy of Volume I and Volume III” of the rules on hand. Section 74.1269 requires the same of FM broadcast translator stations and FM broadcast booster stations.⁵

The apparent purpose of this obligation is to help ensure that broadcasters are familiar with the rules governing their service. These requirements, however, were established more than 40 years ago, and no longer reflect modern realities about the way in which we acquire and process information.⁶ Given licensees’ ability today to immediately access FCC rules via the Internet, requiring broadcasters to retain hard copies of the rules is no longer necessary.⁷ Broadcasters can easily access and review rules online, and download and print copies of any rules as needed. A requirement to obtain and keep hard copies of FCC rules therefore should be eliminated. Removing this rule would also help small broadcasters in particular, as it will help them cut unnecessary costs.

⁴ Notice at ¶ 1.

⁵ 47 C.F.R. § 74.1269. Both provisions state that copies of the FCC’s rules may be obtained from the Government Printing Office in Washington DC.

⁶ Notice at ¶ 3.

⁷ See *Amendment of Section 73.1216 of the Commission’s Rules Related to Licensee-Conducted Contests*, Report and Order, 30 FCC Rcd. 10468, 10472 (2015) (the Internet is the “medium used most by the public to obtain information instantaneously”).

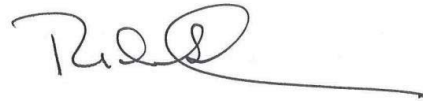
III. CONCLUSION

NAB strongly supports the proposal to eliminate rules requiring broadcasters to maintain a hard copy of Commission regulations. The current requirements place an unnecessary burden on broadcasters – particularly small broadcasters – while offering no corresponding public interest benefit.

Respectfully submitted,

**NATIONAL ASSOCIATION OF
BROADCASTERS**

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A handwritten signature in black ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right from the end of the signature.

Rick Kaplan
Jerianne Timmerman
Antrell Tyson

November 13, 2017