



Washington State Association of Broadcasters

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September 23, 2019

Public Disclosure Commission
P.O. Box 40908
Olympia, WA 98504-0908

VIA EMAIL: pdcc@pdcc.wa.gov

Dear Sir or Madam,

The Washington State Association of Broadcasters, which represents over 225 member radio and television across the state, is gravely concerned about the Public Disclosure Commission's proposed Political Advertising rules under WAC 390-18-050.

The PDC's proposal is an overreach, and in fact exceeds Federal political advertising rules that govern broadcasters licensed by the Federal Communications Commission.

Radio and television stations completed the process of migrating their public files, which include political advertising records, to the FCC's database in 2018. In doing so, the FCC eliminated the requirement to have a "hard copy" of the public file available for inspection at its primary studio during regular business hours.

Additionally, the FCC repealed the "Main Studio Rule," which eliminates having a main studio in its city of license or within the contour of its coverage area. Thus, many stations have gone to a "hub and spoke" philosophy to operate more efficiently. Therefore, consumers may visit radio and/or television stations expecting access to the additional political advertising records you propose only to learn that the station is no longer staffed in their community.

We note that your proposal is duplicative in nature, as the public already has access to the political advertising records of radio and television stations in the state of Washington, which can be viewed on the FCC's website.

On behalf of the WSAB's membership, we request relief from your proposals in WAC 390-18-050 and urge you to reconsider your proposal. Specifically, we urge you to eliminate aspects which include creation of a political advertising file to be made available to the public during normal business hours, and the retention of radio and television political advertising messages, as they are in conflict with Federal rules and create extraordinary operational expense for broadcasters, many of whom are small businesses in our state.

Thank you for your consideration.

Kindest Regards,

A handwritten signature in blue ink, appearing to read 'Keith', is written over the typed name.

Keith Shipman
President & CEO

kbs

cc: Mark Allen, Mark Allen Government Relations (via email)
Rowland Thompson, Allied Newspaper Association (via email)