

## Political Advertising Recordkeeping

Good Afternoon,

KING 5/KONG in Seattle and KREM/KSKN in Spokane take very seriously matters of public disclosure, especially as it relates to political advertising. We have always fulfilled our obligations and will continue to do so. However, after reviewing the proposed rules from the Washington State Public Disclosure Commission, the obligations will be onerous and go far beyond the obligations required by the FCC.

First, expanding the political record retention requirement to 5 years is over reaching when compared to the FCC's long-standing requirement of two years. While historically we have gotten occasional inquiries during election cycles, we rarely had inquiries after an election has concluded, much less 5 years later (as proposed by the PDC).

Secondly, we air tens of thousands of advertising messages each year and are not equipped to warehouse political spots on our servers for extended periods of time. As a matter of practice, we purge our servers on a regular basis to make room for new messages we need to store. Housing political spots outside of our servers, whether it be stored separately at the station or housed on our website, involves new infrastructure and costs.

Finally, the requirement to allow access to the records in-person, even when the station's FCC-mandated political advertising records are fully available online, is unnecessary, disruptive to the station, and creates potential security concerns, as the FCC has recognized in allowing the full transition of stations' public inspection files to the FCC's online system.

While the FCC has taken steps to modernize rules to acknowledge public access to political files in the digital age, the proposed rules take us several steps backward.

Again, we consider our public disclosure obligations part of our mission, but the significant expansion of requirements does not seem to be in anyone's interest.

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