

Congress of the United States
Washington, DC 20515

September 18, 2014

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The Honorable Tom Wheeler, Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Chairman Wheeler,

We write in strong support of the July 31, 2014, petition for rulemaking filed by the Campaign Legal Center, Common Cause, and the Sunlight Foundation. Adoption of this petition would enhance campaign disclosure by requiring cable, satellite, and broadcast radio stations to post existing political file documents to the FCC's online database. As of July 1, 2014, all broadcast television stations are already subject to this simple requirement which greatly improves the accessibility of the political advertising data disclosed in the political file.

The 2014 election is projected to be the most expensive midterm election cycle in U.S. history. Spending on political television advertisements is expected to surpass \$2.4 billion in the 2014 election cycle, a 70 percent increase over 2010. Even more concerning is the rapid increase in spending by outside groups, many of which are not required to disclose donors or expenditures to the Federal Election Commission (FEC). According to the Center for Responsive Politics, outside spending to date in the 2014 election cycle is three times higher than at this point in 2010.

As outlined in the rulemaking petition, cable and satellite providers have seen an increasing share of political spending over the last several election cycles. In 2014, experts predict that cable will account for a quarter of all televised political advertising nationwide. Broadcast radio is also expected to see increased political advertising in the 2014 cycle, with projected revenues of over \$400 million. Given this trend, it's imperative that the FCC expand its online filing requirement to cable and satellite operators, as well as broadcast radio licensees.

We also urge the FCC to consider taking steps to enhance the accessibility of online political file documents. For example, requiring online filings to be uploaded to the FCC's database in a standardized or searchable format would substantially improve the ability of the public, journalists, and policymakers to aggregate and analyze political spending data.

The proposed rulemaking would require all political advertisements, regardless of whether they are aired on broadcast television, cable, satellite, or radio, to be disclosed in a single, comprehensive online database. When combined with improved accessibility of these documents, this will provide the public with a simple and straightforward means to access public information that is already disclosed in each operator's political file. This action is especially important given that the political file can shed light on the expenditures of outside groups that are not subject to oversight by the FEC.

We urge you to take these commonsense steps to improve transparency and ensure unfettered public access to this critically important information.

Sincerely,



Anna G. Eshoo
Member of Congress



Henry A. Waxman
Member of Congress



Bill Nelson
U.S. Senator

cc: Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly