

**STATEMENT OF
COMMISSIONER MICHAEL O'RIELLY
APPROVING IN PART AND CONCURRING IN PART**

Re: *Promoting Diversification of Ownership in the Broadcasting Services*, MB Docket No. 07-294; *Review of Media Bureau Data Practices*, MB Docket No. 10-103; *Amendment of Part 1 of the Commission's Rules, Concerning Practice and Procedure, Amendment of CORES Registration System*, MD Docket No. 10-234

This Order includes some modifications to streamline the ownership reporting process for broadcasters, especially by reducing the number of filings required, and as I believe any efforts in this direction should be strongly encouraged, I generally approve.

I question whether the Commission's limited resources are best spent collecting, crunching, and disseminating statistics about broadcast station owners, when the marketplace is extremely dynamic and fluid. To the extent it is to be done, it seems that the Restricted Use FRN may not be that harmful, as long as the data is sufficiently protected. I take no position on or responsibility for the Commission's representations that it can do so going forward.

However, I have reservations about the value of imposing the reporting requirements for commercial entities onto noncommercial educational ("NCE") broadcast stations. Many of these NCE licensees have such attenuated relationships with their reportable interest holders (for example, the individual members of a Board of Governors for an entire state university system may be considered to own a college radio station) that it strains the understanding of "ownership" beyond recognition within the context of attempts to promote ownership of TV and radio stations by small businesses, women, and minorities. The rationale for collecting (and taking responsibility for protecting) additional sensitive, personally identifiable information from these individual "owners" is equally as strained. In the end, I question whether the data collected will have any valuable impact on our decision making, given its uniqueness. Therefore, I concur in part.

On a larger perspective, my support and concurrence in this item should not be read as an endorsement of the use of certain practices in other contexts.