



December 2, 2013

Diane Cornell, Esq.
Special Counsel
Office of the Chairman
Federal Communications Commission
445 12th Street SW
Washington DC 20554
Via Email

Re: Call for Input: Improving Government Efficiency at the FCC

Dear Ms. Cornell:

The National Association of Broadcasters (“NAB”) appreciates the opportunity to offer input for your report on ways that the FCC can improve the efficiency of its processes. We also look forward to working with you and the agency to find ways to implement efficiency reforms as part of rulemaking proceedings where specific procedures are being considered.

- 1. Increase Transparency Concerning Enforcement-Related Matters.** Action on applications for assignment, transfer of control, or renewal of a broadcast license is sometimes subject to a “hold” while the Enforcement Bureau determines an appropriate course of action in response to a complaint. In many cases, a broadcast licensee does not learn that a complaint has even been filed until after there has been a substantial delay in action on an application. NAB suggests that the FCC increase transparency by informing licensees of any pending complaints and the dismissal of such complaints.
- 2. Consider Ways to Streamline the Broadcast License Renewal Process.** Enforcement-related matters or other issues can substantially delay action on broadcast license renewal applications. Broadcast licenses are renewed every eight years. Even with these lengthy renewal periods, broadcast licensees sometimes find themselves applying to renew their licenses while they await action on their applications from the previous renewal cycle. The FCC should establish a specific process for addressing objections and other matters delaying the timely processing of license renewal applications.

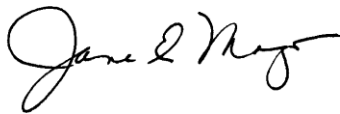
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3. Modernize and Create Greater Uniformity Across Application Filing Systems.

Today, an entity that holds licenses administered by different FCC Bureaus/Offices must utilize a range of different services – including, for example, the Universal Licensing System (ULS), the Consolidated Database System (CDBS), the International Bureau Filing System (IBFS), and the Cable Operations and Licensing System (COALS).¹ Similarly, anyone who wishes to access information about FCC-regulated entities and/or FCC decision-making must learn to do research using these and other systems (such as the Electronic Comment Filing System). While it is not necessarily practical for comments to be stored in the same database as applications, the Commission should consider whether its multiple databases for filing licensee applications and reports could be truly “universal.” This would likely avoid some duplication of effort by licensees. The Commission also should consider whether the new system can be designed in a manner that is sufficiently robust and capable of handling the volume of material that results from deadlines that affect hundreds (or even thousands) of filers at the same time.

We look forward to a continuing dialogue with you about FCC processes. Please do not hesitate to contact me to discuss these or other potential changes.

Respectfully submitted,



Jane E. Mago
Executive Vice President and General Counsel
Legal and Regulatory Affairs

¹ For example, is very common for a television broadcast licensee to use CDBS to file ownership reports and other applications concerning its television broadcast license, IBFS for filings relating to satellite earth stations, and ULS for filings concerning studio transmitter links. The FCC also has separate systems for certain specific forms and materials such as Children’s Television Programming Reports on FCC Form 398, or the online public file.