Thank you for accepting comments regarding the petition for class waiver submitted by the Radio Broadcasters Coalition ("Coalition").

The FCC requirement that broadcasters have to identify the sponsors of paid content is a service to radio listeners. It helps listeners understand the business model that radio operates under, and gives people insight into why they hear particular songs more than others.

As music is one of the primary factors that both shapes and reflects the culture of a people, it is their right to know the difference between a commercial advertisement, and a song that has earned the esteem of radio programmers based on its artistic merit and/or entertainment value.

I agree with the Coalition that the announcements they currently make are fleeting in nature, and could be missed by the casual listener. Therefore, certainly they should enact their proposal to list the sponsorship identification on their websites as a voluntary measure to supplement the existing "at the time of" announcements.

In terms of eliminating the "at the time of" SID, it should be acknowledged that the initial purpose of the SID was as a disclaimer of sorts, so that the listener was aware of the payment motivating the song performance. The effect of the disclaimer has been a deterrent in the practice of payola in the music industry.

With major label subsidy driving the radio media, the cultural landscape of our airwaves will be dominated by an even smaller few. Talented independents will be forced to negotiate deals with the majors in order to tap the important radio media outlets, and will be dealt an unfair disadvantage should they determine to remain independent.

In order to promote localism, competition, and diversity on the public airwaves, please do not allow the Coalition to effectively legalize payola.

Sincerely,
Amanda Williams