

The National Federation of Community Broadcasters asks that the recordkeeping requirements for use of Sound Recordings under statutory license not be expanded to census reporting. Although we are sympathetic to the reasons for more complete reporting, many Community Radio stations are still keeping playlists by hand and then the information has to be entered into the electronic spreadsheet required for reporting. This consumes considerable staff time and many of our stations have budgets under \$300,000/year and few if any paid staff. I received comments from many of our 200 member stations saying that they would probably have to stop streaming if the reporting requirements were increased. In fact, several stations asked that reporting be modeled on the ASCAP, BMI and SESAC sampling method where stations are randomly selected to report one or two weeks a year at most.

Community Radio stations play a large amount of music from 78's, LP's, and other formats that do not contain all the information that Sound Exchange is seeking. We are proud of the role these stations fulfill in presenting more obscure, eclectic music to broaden the type of music that listeners can hear. But onerous reporting requirements will push stations in the wrong direction – toward more homogenous playlists.

If at some point in the future, good, inexpensive software is developed connected to a comprehensive database of recordings, and when Community Radio volunteer programmers are all computer literate, census reporting would make sense. But we are not at that point yet.

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The **NFCB** is a 33-year-old grassroots organization which was established by, and continues to be supported by, our member stations. Large and small, rural and urban, NFCB member stations are distinguished by their commitment to local programming, community participation and community support. NFCB's 250 members come from across the United States, from Alaska to Florida, from every major market to the smallest Native American reservation. While urban member stations provide alternative programming to communities that include New York, Los Angeles, San Francisco, Chicago, and other major markets, rural members are often the sole source of local and national daily news and information in their communities. NFCB's membership reflects the true diversity of the American population: 41% of members serve rural communities, and 46% are radio services controlled by people of color.