

June 16, 1981

CONCURRING STATEMENT OF
Commissioner James H. Quello

In re: Revision of Application for Construction Permit for Commercial Broadcast Station (FCC Form 301)

While I am generally supportive of the Majority's action in revising the FCC Form 301 to ease burdens on both applicants and the Commission, I am uneasy about one of these changes. I am concerned that the elimination of any financial showing might result in abuse of the Commission's processes. Specifically, I believe that the Commission should have some assurance that an applicant is financially able to construct and operate the facility under consideration before it extends the considerable time and effort often required to process the application. Secondly, I am concerned that fully-qualified applicants might be disadvantaged by applicants who are clearly not qualified. I am also concerned that the Commission could be seriously hampered in its attempts to enforce Section 310 of the Communications Act of 1934, regarding foreign ownership. Where certain eligibility criteria are mandated by the Act, I believe the Commission must retain sufficient access to ownership information to permit it to determine whether those criteria are being met.

I welcome the new era of deregulation of broadcasting services and I generally support such efforts as my record will show. However, there may be a few areas where the Commission should continue to exercise some control if it is to carry out its mandate.

The Commission has indicated that it intends to take a more extensive look at the question of financial qualifications and the extent to which they must be documented. I hope that we can find a means of satisfying the concerns expressed above without returning to the full panoply of detailed financial showings.

Therefore, I concur.

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