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Title: WMVS/MMVT TELEVISION UNDERWRITING

Code: I10100

Policy Reference: I0100, Public Television Stations

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### **POLICY BASIS**

Under MATC Board Policy I0100, the licensing board has authorized Milwaukee PBS (MPBS) stations WMVS/MMVT to seek underwriting for broadcast costs of local productions and those produced elsewhere, while observing Federal Communications Commission (FCC) rules and regulations applicable to noncommercial stations.

### **OVERVIEW**

MPBS staff will solicit underwriting, which may also be referred to as sponsorships, to help offset acquisition, production, promotion, community outreach, and maintenance costs associated with broadcast and broadband distribution of programming.

In exchange for such underwriting support, MPBS will include noncommercial on-air acknowledgments in compliance with FCC rules and regulations that are intended to preserve the noncommercial nature of public broadcasting. While the MPBS stations are members of the Public Broadcasting Service (PBS), some of our local policies may not mirror those of PBS.

### **GENERAL STYLE/CONTENT GUIDELINES**

**Tone** Underwriting credits on MPBS will reflect the tone of our noncommercial, nonprofit broadcasting service, all other legal requirements notwithstanding. Credits will be of a style, pacing, and duration that do not clash with the aesthetics of the programming.

**Form** Underwriters, which may also be referred to as sponsors, will receive visual recognition in the form of an underwriting announcement.

**Credit Length** Generally, specific underwriting announcements should be 15 seconds in length; longer credits of 30 seconds are allowed at the discretion of the MPBS general manager. A maximum of 30 seconds will be allotted for a program with a single underwriter, 60 seconds for two (2) underwriters; and 90 seconds for three (3) or more underwriters. Irrespective of spot length, every effort will be made to limit the length of the copy to that which can be reasonably presented by a professional announcer in a manner and tone appropriate to the stations.



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## **CONTENT GUIDELINES**

**Copy Language** Language in an underwriting announcement is intended to identify the funder and must be value-neutral. Promotional, comparative, qualitative, or superlative language is not permitted in underwriting credit copy, nor can copy dwell inordinately on a product or service. Some sentences, slogans, or descriptions, although factually true, may be considered promotional by FCC standards. This includes references to awards, rankings, ratings, or endorsements that are inherently comparative and thus not permissible.

Basic information (company name, locations, phone number, web address) and some basic descriptive language about the company or the product and service it offers are permissible, but excessive and multiple listings of products or services are not.

The FCC has ruled that an established slogan may be permissible if it has been in widespread use for an extended period of time. Musical signatures that are part of an underwriter's identity may also be used, although advertising jingles that intrude on the noncommercial tone of the announcement are discouraged. (MPBS may require an example showing that a slogan or musical signature is actively in use.)

### **Unacceptable content includes:**

- Price
- Promotion of product, service, or facility
- Direct calls to action/viewer solicitation
- Qualitative description
- Program host selling program-related merchandise
- Self-congratulatory language
- Inducements/incentives to buy, sell, rent, or lease
- Any message that might be construed as an advocacy position on an issue
- Any message that supports or opposes any candidate for public office
- Fundraising for any organization other than a station

### **Examples of permissible and prohibited content include\*:**

*\* this list of prohibited examples comes from the FCC*



ADMINISTRATIVE REGULATION  
AND PROCEDURE

Title: AUTHORIZATION TO RELEASE GRANT FUNDS FOR  
INITIATING THE HIRING PROCESS

Code: HH0602

Prohibited	Permitted
<p><b>Unacceptable words/phrases</b></p> <p>To avoid confusion, avoid adjectives or words of any type that cannot be proven. Certain words or phrases have been deemed inappropriate for use in sponsorship by the FCC. The following list (and words and phrases of <u>similar</u> meaning) should not be used: <i>certified, complimentary, dedicated, dependable, delightfully honest, discount, easier, economical, excellent, fair price, good, guarantee(d), leading, more than, number one (rank), only, prompt, quality, quick and clear, reliable, tasty, very accommodating, warranted.</i> Additional examples are set forth below.</p>	
<ul style="list-style-type: none"> <li>● “Colors more vivid”; “Images more realistic than ever”; “See more, get more”</li> <li>● “The best, fastest, most comfortable way to Poland”; “best airline in the world”</li> <li>● “The highest quality” meats</li> <li>● “Providing quick connection and clear sound bringing you closer to Korea for international long distance service”</li> <li>● “Reliable”; “excellent”; “dependable”</li> <li>● “Efficient, economical, dependable, dedicated [unless aspirational], prompt, fair price, reliable, and excellent”</li> <li>● “[A] leading provider of credit and other business services”</li> <li>● “Providing an opportunity to save on brokerage commission”</li> <li>● “The only full security luxury condominium”; “the only quality SUV with OnStar”</li> <li>● “Very accommodating”; “delightfully honest”; “quality financial services”; “number one”</li> <li>● “Freedom of choice”; “More choices”</li> <li>● “Friendly efficient crew...are always there when you need them most”</li> </ul>	<ul style="list-style-type: none"> <li>● “Creative services for advertising, marketing and training” (Creative material is the stock and trade of all advertising agencies)</li> <li>● “Fresh and original foods” (The sponsor was a grocery and “fresh and original” merely distinguished the sponsor’s products from other types of food [French food or home-made food])</li> <li>● “Daily lunch specials” (This merely referred to the restaurant’s luncheon offerings)</li> <li>● “Professional equipment and supplies” (Merely refers to the general type of merchandise offered)</li> <li>● Offering “home style food” and “bakes [its] pies daily” (Refers to products in general categorical fashion)</li> <li>● “An intelligent four-wheel drive system” (Same)</li> </ul>



ADMINISTRATIVE REGULATION  
AND PROCEDURE

Title: AUTHORIZATION TO RELEASE GRANT FUNDS FOR INITIATING THE HIRING PROCESS	Code: HH0602
---	--------------

<ul style="list-style-type: none"><li>● <i>“Largest towing facility ... uses modern damage-free equipment ... so you can be assured your vehicle will be handled with care”</i></li><li>● <i>“When the time comes to make an insurance decision, you want someone you can trust to guide you in the right direction... dedicated to providing quality, honest insurance coverage”</i></li><li>● <i>“Reliable performance and affordability... known for its consistency”</i></li><li>● <i>“Acquir[ing] diamonds directly from the diamond cutter”</i></li><li>● <i>“Has name-brand musical instruments and sound equipment”</i></li><li>● <i>“Convenient drive-through window”</i></li><li>● <i>“Revolutionary dual display functions”</i></li><li>● <i>“Pretty to catch my fancy... strong... sharp... beautiful safety design... detailed lines, gorgeous power acceleration”</i></li><li>● <i>“Romantic, soft and gentle ... you don’t want to leave”</i></li><li>● <i>“Easy and fast”</i></li><li>● <i>“New Sentricon Baiting System”</i></li><li>● <i>“Is a member of the Professional Photographers of America”</i></li><li>● <i>“Biggest variety of undershirts, polos, short and long sleeve oxford shirts”</i></li><li>● <i>“The people that know most about embroidery and printing”</i></li><li>● <i>“Greatest bakery in Kissimmee”</i></li><li>● <i>“Famous frappe”</i></li><li>● <i>“Established dealer in Central Florida for the past ten years”</i></li><li>● <i>“Installation services in twenty four hours”</i></li><li>● <i>“Only”</i></li></ul>	<ul style="list-style-type: none"><li>● Surgery <i>“never has to be unpleasant”</i> (Statement does not appear to distinguish the sponsor’s medical skills from those of other oral surgeons)</li></ul>
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**Preferred Copy** While not required, preferred copy will inform the viewer of the underwriter’s support for MPBS and/or public television/broadcasting.



ADMINISTRATIVE REGULATION  
AND PROCEDURE

Title: AUTHORIZATION TO RELEASE GRANT FUNDS FOR INITIATING THE HIRING PROCESS	Code: HH0602
---	--------------

**Visuals** Visual can include bona fide non-promotional stills or animated logos that the viewer would associate with the sponsor or its products or services. Visual depictions of up to four (4) products or services are permitted. Product demonstrations are permissible as long as the use of people is incidental or minimal and does not constitute an endorsement.

Both a phone number and website address may be used in the same credit as long as the result is not an overly cluttered image.

**Children's Programming** MPBS takes special care to foster a safe and noncommercial on-air environment for our young viewers. Because of this and the trust placed in public television by parents and childcare providers, underwriting for MPTV children's programming will be guided by a more conservative approach reached in consultation with the sponsor.

**Guidelines for Nonprofit Underwriters** The FCC does not treat profit and nonprofit entities the same when it comes to underwriting. The restrictions contained in this administrative regulation apply to for-profit entities only. Nonprofits, by contrast, may promote their services, facilities, or products, although this should be done in a manner that is consistent with MPBS's overall tone. Pricing information, for example, is not permitted even for nonprofits. Additionally, nonprofits (as well as for-profits) may not express views with respect to any matter of public importance or interest.

**Other Guidelines** MPBS underwriting will maintain a position of neutrality with respect to religion, politics, and other issues of a controversial nature. Such potential underwriting credits will be considered on a case-by-case basis, applying good faith judgment and "reasonable listener/viewer" thinking. By law, underwriting may not be used as a forum for political campaigns or controversial issues of public importance. Therefore, MPBS will not accept underwriting regarding or advocating a position on public issues (e.g., taxes, abortion, gun control, health care, candidates for political office, referendums).

MPBS prohibits any linkage between an underwriter and editorial control of our programming, and will avoid even the appearance of such a linkage.

MPBS will not accept underwriting grants from organizations that would include certain products or activities in its on-air announcements. These organizations and/or products include (but are not limited to) tobacco products and outlets, political candidates, political lobbying organizations, non-state or tribal-sanctioned gambling activities, certain personal products, firearms and/or weapons and ammunition manufacturers,



Title: AUTHORIZATION TO RELEASE GRANT FUNDS FOR INITIATING THE HIRING PROCESS	Code: HH0602
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and organizations whose names by themselves might raise a political, controversial, or divisive issue.

MPBS may accept underwriting from entities engaged in the manufacture and/or distribution of alcoholic beverages, including beer, wine, and spirits. Beer, wine, and spirits sponsorship spots must meet the same standards as all other spots and specifically should not include a visual of product consumption.

**Frequency of Spots** In consultation with the underwriter, MPBS will determine the appropriate number and scheduling of sponsorship credits, which will be consistent with the stations' goals of maintaining a noncommercial on-air environment and encouraging sponsorship support from diverse sources. Generally, underwriting credits will be broadcast at the beginning and end of a program; during a program that runs 75-minutes or longer, the underwriting credit may also be shown in a natural break within the program.

### **APPROVAL AUTHORITY**

**Underwriting Acceptance** MPBS reserves the right to reject any underwriting credit, or portion thereof, which in the judgment of the stations' management would violate an FCC rule or policy, fail to serve the public interest, violate MPBS policies, or adversely affect the reputation, financial condition, or best interest of the stations. The past or current use of any underwriting content does not constitute binding precedent and, therefore, does not serve as justification for future underwriting decisions.

No set of specific guidelines will anticipate every use or possible combination of permissible creative elements that constitute an underwriting credit. Therefore, even though such a credit may be in compliance with each individual component of this regulation, an underwriting announcement must also meet the test of whether its *overall* character and effect is in keeping with the noncommercial nature of MPBS.

**Final Authority** No underwriting credit may be broadcast until its content has been approved by the MPBS vice president and general manager or his/her designee. Final determination of acceptability of sponsorship credits rests with the MPBS vice president and general manager.

**Nationally Distributed Programming** Underwriting for programs produced by MPBS that are to be distributed nationally, through PBS or another public television organization, must adhere to the underwriting guidelines of that organization, which may differ from MPBS's.



**ADMINISTRATIVE REGULATION  
AND PROCEDURE**

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Title: AUTHORIZATION TO RELEASE GRANT FUNDS FOR INITIATING THE HIRING PROCESS	Code: HH0602
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Office of Responsibility: WMVS/WMVT-TV Station Management  
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