



FEDERAL COMMUNICATIONS COMMISSION
Enforcement Bureau, Investigations and Hearings Division
445 12th Street, SW
Washington, DC 20554

March 11, 2015

VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED
AND BY FACSIMILE AT (202) 457-4511

Anne Lucey, Esquire
Senior Vice President
CBS Corporation
601 Pennsylvania Avenue, N.W.
Suite 540
Washington, D.C. 20004

WARNING FOR POSSIBLE SPONSORSHIP IDENTIFICATION VIOLATION

Re: Station KCBS-TV, Los Angeles, California
Facility ID No. 9628
File No. EB-10-IH-4105

Dear Ms. Lucey:

This letter pertains to allegations that CBS Broadcasting Inc. (CBS), licensee of Station KCBS-TV, Los Angeles, California, broadcast several announcements on behalf of Sports Club LA, Morongo Casino, and the City of Hope in 2010 without also providing sponsorship identification for the spots at the time they were broadcast. The Enforcement Bureau investigated these allegations pursuant to Sections 317 and 507 of the Communications Act of 1934, as amended (Act),¹ and Section 73.1212 of the Commission's rules (Rules).² The subject statutory and rule provisions enforced by the Commission generally require a licensee to make sponsorship identification announcements whenever it broadcasts matter in return for money, service, or other valuable consideration.

The foregoing allegations and the Enforcement Bureau's investigation raise credible questions concerning CBS's compliance with certain provisions of the Act and Rules. In particular, we remind CBS that whenever a station transmits any matter for which money, service or other valuable consideration is paid or promised, it must announce that such matter

¹ 47 U.S.C. § 317 (Announcement with respect to certain matter broadcast) and 47 U.S.C. § 508 (Disclosure of certain payments).

² 47 C.F.R. § 73.1212 (Sponsorship identification; list retention; related requirements).

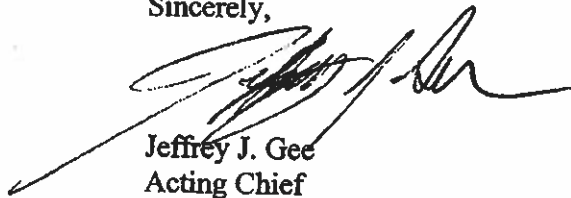
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was sponsored, paid for or furnished by a third party, and must affirmatively identify that third party at the time any sponsored material is aired.³

The Commission has explained that the sponsorship identification rules are “grounded in the principle that listeners and viewers are entitled to know who seeks to persuade them. . . .”⁴ The Commission has further opined that “[t]he disclosures required by the sponsorship identification rules provide listeners and viewers with information concerning the source of material in order to prevent misleading or deceiving those listeners and viewers.”⁵

These Commission requirements are an important part of ensuring that stations provide service in the public interest, and we expect full compliance from all licensees. We hereby caution CBS to take all necessary steps to ensure compliance with the Act and Rules. We advise CBS that the Enforcement Bureau will give enhanced scrutiny to any evidence of future violations and that we may consider past conduct in the calculation of any proposed penalty.

Sincerely,



Jeffrey J. Gee
Acting Chief
Investigations and Hearings Division
Enforcement Bureau

cc: CBS Broadcasting Inc. (via First Class Mail)

³ See *id.*

⁴ See, e.g., *Commission Reminds Broadcast Licensees, Cable Operators and Others of Requirements Applicable to Video News Releases and Seeks Comment on the Use of Video News Releases by Broadcast Licensees and Cable Operators*, Public Notice, 20 FCC Rcd 8593, 8593-94 (2005).

⁵ *Radio License Holding XI, LLC*, Notice of Apparent Liability for Forfeiture, 27 FCC Rcd 930, 933 ¶ 7 (2012), Forfeiture Order, 29 FCC Rcd 1623 (2014) (forfeiture paid), citing *Sonshine Family Television, Inc.*, Notice of Apparent Liability for Forfeiture, 22 FCC Rcd 18686 (2007), Forfeiture Order, 24 FCC Rcd 14830, 14834 ¶ 12 (2009) (forfeiture reduced and paid).