

1000 Potomac Street N.W. Suite 200 Washington, D.C. 20007 Main: 202.965.7880 Fax: 202.965.1729 foster.com

Direct Phone: 202.298.2527 melodie.virtue@foster.com

June 1, 2020

Via Email to Barbara.Kreisman@FCC.gov Barbara Kreisman, Chief, Video Division Federal Communications Commission

Re: Fundraising Waiver Request – COVID-19 Relief Fundraiser

St. Lawrence Valley Educational TV Council, Inc. WPBS-TV, Watertown, NY, Facility ID 62136

Dear Ms. Kreisman:

On behalf of St. Lawrence Valley Educational TV Council, Inc., licensee of WPBS-TV, Watertown, New York ("WPBS"), we hereby request another waiver of Section 73.503(e)(3) of the Commission's Rules to air a fundraiser for COVID-19 relief through four United Way organizations in our region to address the most immediate public health and economic impacts of the spread of the virus in our market. This request is filed pursuant to terms set forth in paragraph 20 of the Report and Order in *Noncommercial Educational Station Fundraising for Third-Party Non-Profit Organizations*, 32 FCC Rcd. 3411, 3422 (2017). WPBS is funded by Corporation for Public Broadcasting and thus needs a waiver of FCC Rule 73.503(e)(3) in order to participate in a third-party non-profit fundraiser. Good cause exists for a waiver because the COVID-19 virus has been declared a global pandemic which has caused businesses and government to advise their employees to stay home, thereby displacing many businesses and their workers, with severe impacts on our economy and vulnerable citizens. *See, e.g.*, <a href="https://www.fcc.gov/coronavirus">https://www.fcc.gov/coronavirus</a>. *See also Public Notice*, DA 20-304, released March 19, 2020, at <a href="https://docs.fcc.gov/public/attachments/DA-20-304A1.pdf">https://docs.fcc.gov/public/attachments/DA-20-304A1.pdf</a>. The specifics of the parameters of the fundraiser are:

- 1. <u>Nature of Fundraising Effort.</u> WPBS proposes to raise money through on-air solicitations for COVID-19 relief and response in our viewing area by hosting a concert program called "Music Across the Border: A United Way Benefit Concert." The station will make appeals for viewers to donate by displaying a call-in number for donations along with the urls for each of the four United Way organizations in the station's viewing area. The call-in number will be a single 800 number and calls will be routed to the respective United Way call center that serves the region where the caller is located.
- 2. <u>Duration of the Fundraising Effort</u>. WPBS plans to air the concert on Tuesday, June 9, 2020 from 7:30 9:00 p.m.

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- 3. <u>Organizations to which Funds will be Donated</u>. Funds will be donated to the four United Way organizations in our region: United Way of Greater Oswego County and United Way of Northern New York and in Canada, the United Way of Kingston, Frontenac, Lennox & Addington and United Way of Eastern Ontario (based in Ottawa). All four have specific COVID-19 relief initiatives and the funds will support those efforts.
- 4. Whether the Fundraiser will be part of the Station's Regularly-Scheduled Pledge Drive or Fundraising Effort. The fundraiser will not be part of the WPBS regularly-scheduled pledge drive or fundraising effort. It will be a standalone campaign and not part of WPBS' regular fund drive.

Should there be any questions regarding this request, please contact this office directly.

Respectfully submitted,

Melodie A. Virtue

MAV:cll