



## UNDERWRITING ON WYSU

### FCC regulations, Station Policy and Copy-writing Guidelines

#### FCC and Public Broadcasting - Background

The FCC (Federal Communications Commission) was established by the Communications Act of 1934 and is charged with regulating interstate and international communications by radio, television, wire, satellite and cable. They are charged with regulating radio and TV in the US, including noncommercial radio and TV and enforcement of a prohibition on the broadcast of “advertisements” by noncommercial stations is one the FCC’s responsibilities.

#### FCC Guidelines Regarding Underwriting

Stations are required to identify entities that provide consideration in exchange for some form of on-air acknowledgment. However, stations are not allowed to air advertising.

The FCC defines advertising as:

- “Any message or programming material which is broadcast or otherwise transmitted in exchange for any remuneration, and which is intended:
- “to promote any service, facility or product offered by any person who is engaged in such offering for profit;
- “to express the views of any person with respect to any matter of public importance or interest; or
- “to support or oppose any candidate for political office.”
- Religious, political or other messaging that advocate a particular point of view (value neutral messaging is acceptable.)
- Lotteries, tobacco or firearms

Regarding Advocacy, political and religious messaging: In no circumstances will the language of an underwriting announcement express an opinion on matters of public concern or otherwise advocate positions on controversial matters. All announcements are subject to approval by WYSU’s station management. With respect to religious messaging, given that most listeners will

be of different religions, care should be given to ensure that underwriting messages are appropriate to the context of public radio, consistent with WYSU's publicly-supported mission and funding profile, and not unacceptable to those listeners who may not share the underwriters' religious perspective. A reasonable listener test will be applied under these circumstances. In addition, this rule prohibits proselytizing language or other language intended to draw distinctions between different religions.

To be clear, events can take place at religious institutions and the events can be mentioned in messaging so long as they are not promoting the religious services and points of view.

**WYSU reserves the right to reject announcements that are inconsistent with WYSU standards and practices.**

### **Underwriting Credits May Include**

Stations are allowed to identify, not promote, commercial entities that provide general support for the station. This identification can include the following:

- The name of the person or entity
- Corporate mission
- Location information
- Telephone numbers and website addresses
- Value neutral descriptions of a product line or service
- Brand and trade names
- Product or service listings that do not include qualitative, promotional or comparative language

### **Underwriting Credits May Not Include**

The following items are not acceptable in underwriting credits or announcements on behalf of for-profit organizations:

- Price information
- Calls to action
- Inducements to buy, sell, rent or lease
- Comparative information
- Qualitative information
- Promotional language

The FCC's rules and WYSU copy are more lenient with respect to the above for non-profit (predominately arts) organizations.

### **Important note:**

An underwriting credit may be promotional even if the information it contains is factually true. The fact that the underwriter's claim can be proven will not make it acceptable. If the copy violates one of the restrictions listed above, it is unacceptable. For example, even if it were true that an underwriter had received an award or offered the lowest prices in town, the underwriting credit could not refer to these facts.

Underwriting prospects will be notified of WYSU policy, and all requests will be reviewed and evaluated to determine if the organization and/or its copy falls into any of the above categories.

**GENERAL GUIDELINES FOR WRITING COPY – Don't worry - Your underwriting associate is happy to work with you for the best messaging possible!**

- 1) Copy should be 15 seconds when read at a "normal" rate which is approximately 37 words. The copy length includes a preamble that can be shortened at the on-air host's discretion but it should be figured into the word count and timing.  
"Support comes from;" "WYSU is supported by;" "Today's support comes from;" "Support is provided by" etc. Spell out a website for word count such as:  
Butler Museum dot com as opposed to butlermuseum.com  
Butler Museum dot com slash tickets as opposed to butlermuseum.com/tickets.
- 2) Avoid phone numbers when a website is available since phone numbers are hard to remember. When adding phone #'s they should count as 3 words.
- 3) ANY slogan must be substantiated before being used (established use on website, letterhead and/or advertising.)
- 4) If a name is very long – do not repeat it if at all possible.
- 5) Look for unnecessary words use:  
"More information is available at," which can be shortened to "Information available at;" "at 7:30 PM on Friday, November 16<sup>th</sup> can be "Friday, November 16<sup>th</sup> at 7:30 PM" or "Friday night (or evening) November 16<sup>th</sup> at 7:30;  
Keep in mind that PM and AM are not always necessary since concerts are generally in the evening not the morning (example at 7:30) and an all-day event that runs 10 AM until 4 PM is understandable as 10 until 4;  
"free and open to the public;" many times can just be "free"  
"right in downtown Youngstown" can be "in downtown Youngstown
- 6) Do not make claims of success "enriches the lives," - claims can be stated as "dedicated to enriching the lives."
- 7) Avoid use 2<sup>nd</sup> person "you can," "your" "we"
- 8) Avoid the use of free and pricing in non-profits (not allowed at all by for-profits).
- 9) Whenever possible, copy should be reviewed prior to the client signing the contract.