

DENVER COMMUNITY MEDIA

UNDERWRITING GUIDELINES

The Community Producer shall comply with all Federal Communications Commission regulations. All underwriting and sponsorship agreements secured by the Producer must be approved by the Community Media Access Coordinator.

All underwriters/financial contributors (financers) to content/programming for Denver Community Media must be identified in relation to the programs funded/the video by their name and/or logo during the underwriting announcements. A financer may not be anonymous. If a logo by itself does not adequately disclose the identity of a financer, then the financer's name must be stated in audio or video.

Per FCC requirements, "...the purpose served by underwriting credits is to identify the funder in the interests of full disclosure, not to promote the funder or its products and services. At the same time, however, the FCC has indicated that it will rely on the good faith determinations of public broadcasters in interpreting the FCC's non-commercialization guidelines."¹

1. Producers must "fully and fairly disclose the true identity" of all financial contributors.²
2. Underwriting announcements must include the company's name, and may include the company's location/contact information, website URL; company logos and symbols; and the company's slogan or tagline, as long as it meets FCC guidelines. Underwriting announcements may not exceed 60 seconds in length and no individual credit may exceed 15 seconds in length. This credit time must be included in the total calculated program length as indicated on the program submission information. Underwriting announcements may appear once at the beginning and once at the conclusion of the program, but not within the body of the program.

Acknowledgements shall be for identification purposes only. Per FCC guidelines, the following promotional content is prohibited:

- Announcements containing a "call to action";
- Qualitative descriptions about the company, its products, or its services;

¹ RMPBS, "PBS National Program Funding Standards and Practices."
<https://www.pbs.org/about/producing-pbs/proposal-process/guidelines/underwriting-1/>

² 47 C.F.R. § 73.1212(e)

- Direct comparison with other companies, or with other companies' products or services;
- Price or value information;
- Inducements to buy, sell, rent, or lease;
- Endorsements;
- Demonstrations of consumer satisfaction.³

Member producers may seek funding for their programs from private and/or public sources only to cover expenses associated with the production of content submitted to Denver Community Media. Underwriters may not influence any content or provide editorial input. Impermissible editorial influence may include circumstances where the underwriter/funder is able to participate in the production process after the initial conceptual stage is complete; specify in detail what the content is about; direct the conclusions or opinions of the content; provide input on scripts, outlines, rough cuts, or fine cuts prior to distribution by DCM; appoint or approve experts to be interviewed or advisors to provide guidance about the content's development; influence or contribute to decisions about the scheduling of content for DCM distribution; or control distribution of content.

The City accepts no liability for any disputes member producers may have with underwriters. All underwriting announcements must be in compliance with FCC guidelines.

³ FCC, 1992 Reprint excerpted from Public Notice, April 11, 1986 (FCC 86-161), which was published at 51 FR 21800, June 16, 1986 [7 FCC Record 827].

<https://www.fcc.gov/media/radio/nature-of-educational-broadcasting#TABLE>.

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