

KWMV Underwriting Guidelines and Policies

Due to FCC regulations of non-commercial airwaves there are rules we must abide by in any underwriting announcement. KWMV has created guidelines to ensure compliance with FCC guidelines, to stay consistent with the KWMV mission and to maintain a non-commercial stationarity. The following is a brief description of what can and cannot be used:

Legal or trade name must be stated to identify the underwriter.

Any or all of the following may be used in acknowledgement copy:

- Telephone number, email address, web site and location of business or area served.
- Days of operation
- Value neutral descriptions of a product line or service
- Brand and trade names and product or service listings
- Visual descriptions of specific products
- A listing of up three (3) products or services
- Product origin "Belgium Waffles" or "French Bread"
- Intended use of product, "Men's Suits" or "Breakfast, Lunch and Dinner"
- Product content, "Silk Blouses" "Leather Shoes"
- Form of delivery, or method of preparation, "made from grapes" or "cooked with herbs"
- The organization's mission and/or corporate non-promotional slogans if they are in well established use by the business and the wording stays within the spirit of these guidelines.

None of the following may be used in acknowledgement copy:

- Qualitative language or superlatives (handcrafted; homemade; great; wonderful)
- Comparative language, (better; most)
- "Calls to Action" (call today, come by)
- Location of business using another business as a reference, (located next to or near by)
- Price or value information (including "free", "affordable", "discount" or interest rates)
- Inducements to buy, sell rent or lease (6 months free when you buy or lifetime guarantee)
- Endorsements (recommended by 4 out of 5 doctors, used by professional hunters...)
- Demonstrations of consumer satisfaction

- First person statements, (I urge you or Our Valley or We are working together...)
- Second person statements, (making your smile bright...)
- Announcements of a religious nature, associated with a political position, cause or issue of controversy, are unacceptable, regardless of the merits of the particular cause, issue or party. This also includes issues of public importance such as statements like "Support for KWMV comes from Jane Doe, a supporter of universal health care."
- Music and/or sound effects, voicing by the underwriter (all underwriting will be voiced by KWMV announcers).

FCC policy statements, rulings, advisory opinions, and letters applying its rules and policies to specific underwriting announcements (credits) have cautioned against the use of certain types of language and phrases which it deems promotional.

Some of the words and phrases that the FCC has found unacceptably promotional include: Efficient, Economical, Dependable, Dedicated, Prompt, Fair Price, Reliable, Excellent, Leading, Luxury, Quick and clear, Very accommodating, Delightfully honest, Quality, Number One.

The FCC has also advised that **credits may be considered promotional even if they include statements of fact** or longstanding slogans. 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, a business that is the "award-winning" retailer of a product or offers the lowest prices in the area should not include that information in their underwriting credit, even if it is true and serves to identify the retailer, because the statement is promotional in nature.

The FCC's rules are more lenient for non-profit organizations and these items are permissible for those organizations as long as that message is not in support of an issue or political candidate. That said, **KWMV has chosen to apply the for-profit rules to non-profits for several reasons.** One reason is that revenues received in exchange for promoting a non-profit are subject to unrelated business income tax (UBIT), so it is an administrative hassle to segregate these revenues and determine whether tax is owed. Another reason is that some stations want to keep their on-air sound as non-commercial as possible. Listeners may not always understand that an entity is a non-profit and may be confused by what sounds like an ad. It can also be difficult for underwriting staff to explain to a for-profit underwriter why the station permits other underwriters to use the very promotional language it has told the for-profit it may not use.

In addition, FCC policy prohibits public stations from fundraising on behalf of nonprofits or other entities when it involves the suspension of regular programming (e.g., charity-

athons). The general idea is that, when public broadcasters suspend regular programming to appeal to the public for money, it has to be for the benefit of the station itself, as in the usual pledge or auction programming.

KWMV's guidelines also do not allow music and/or sound effects, voicing by the underwriter (all underwriting will be voiced by KWMV announcers). Announcements of a religious nature, associated with a political position, cause or issue of controversy, are unacceptable, regardless of the merits of the particular cause, issue or party.

Underwriting spots can be up to 15 seconds in length and time slot will not be guaranteed.

All underwriting copy, including corporate slogans, is subject to approval of the station management of KWMV. KWMV reserves the right to refuse underwriting for any reason.

Underwriting is support for current programs at KWMV. Financial support does not in any way imply that sponsors may influence program content or programming decisions.