

# **Classical California Underwriting Policy Statement**

## **Policy Purpose**

KDFC-FM and KUSC-FM (and their additional channels), referred to in this document as **Classical California**, recognizes its duty to determine which programming and on-air material will best serve the public interest and maintain the noncommercial nature of public broadcasting. To that end, Classical California, retains discretion over the format, subject matter, duration, and scheduling of all broadcast material, including underwriting announcements. The purpose of this policy is to ensure that Classical California:

- Complies with FCC underwriting rules and regulations and all other applicable laws.
- Reviews public broadcasting resources underwriting guidelines to ensure consistency in Classical California's underwriting announcements.
- Makes underwriting decisions in the best interests of Classical California's mission and business needs.
- Continues to earn the public's trust by providing a noncommercial service.

## **Underwriting Policy 2026**

### **Review and Revision of Underwriting Announcements**

- Classical California will review every proposed local radio underwriting announcement for compliance with this Policy.
- Classical California will require revisions to proposed announcements to the extent it deems necessary to comply with FCC rules and regulations, all other applicable laws, and non-commercial public radio guidelines
- Classical California will require revisions to proposed announcements to the extent Classical California deems advisable in view of the station's underwriting goals, business needs, and the public interest.
- Classical California will be particularly cognizant of special considerations underlying announcements directed at children and Classical California may, using its discretion, reject, require revisions to, or require rescheduling of, underwriting announcements that are directed at children

### **Restricted Categories**

Classical California reserves the right to reject any underwriter and/or announcement for any reason Classical California deems appropriate and in the interest of its audience and members. Accordingly, and without limiting the scope of its discretion, Classical California does not accept underwriting announcements referring to:

- "Adult" products and services.
- Tobacco products.
- From organizations or individuals whose activities are illegal. If doing so would violate an established Classical California policy (e.g., Nondiscrimination Policy, Employee Ethics Policy, Conflict of Interest Policy, Editorial Policy).

The Internal Revenue Service (“IRS”) and the FCC regulate Classical California’s ability to broadcast political content. Furthermore, in keeping with its role as a trusted source of educational material, entertainment and information, it is Classical California’s policy to remain neutral on controversial topics of any kind, including but not limited to politics and religion. Therefore, Classical California does not accept underwriting announcements from:

- Political parties or political candidates.
- Individuals or organizations working to influence elections, legislation, or regulatory outcomes if, in Classical California sole discretion, a Reasonable Listener would find the message to be primarily political in content or tone.
- Religiously affiliated organizations, if, in Classical California’s sole discretion, a Reasonable Listener would find the message to be primarily religious in content or tone.

FCC regulations do not apply to underwriting announcements appearing online. However, IRS regulations and other laws may apply. Accordingly, Classical California reserves the right to reject any online underwriter and/or announcement or require revision of any online underwriting announcement for any reason Classical California deems appropriate and in the interest of its audience and members.

In exercising its discretion to accept or reject underwriters or underwriting announcements, Classical California will adhere to the Classical California Editorial Policy which, among other things, requires Classical California staff to remain independent from the undue influence of any internal or external source.

### **The “Reasonable Listener” Standard**

Certain underwriting will be evaluated as described above by applying a “Reasonable Listener” standard. In deciding whether to accept or decline underwriting based on political or religious content, Classical California Management will consider whether a reasonable listener or viewer would find the underwriting message to be primarily political or religious in content or tone.

### **Oversight**

- Classical California Management will be responsible for day-to-day underwriting content and decisions.
- Classical California Management will draft detailed procedures when and as necessary for staff to follow to ensure compliance with this Policy.
- Classical California Management will exercise appropriate oversight to ensure that Classical California staff complies in all material regards with this Policy.
- In the event that a particular underwriting decision may have a significant public impact or be deemed controversial, Classical California Management will consult in advance with the Board of Directors, if possible; otherwise, Classical California OPB Management will notify the Board within a reasonable period of time.
- This Policy will be reviewed annually