

Template 1.

Underwriting Guidelines

The FCC has identified five practices that promote rather than identify and therefore are not permissible for air on non-commercial stations: comparative descriptions, qualitative descriptions, pricing information, calls to action and inducements to buy, sell, rent or lease. Here are examples of each:

1. Comparative Descriptions

Donor acknowledgements that contain descriptive language comparing the underwriter's products with those of competitors are not permitted. Comparative descriptions usually include words that draw an explicit or implicit comparison to others, such as:

Best Better More Superior

Examples of acknowledgements that include these comparative terms are:

"Serving more cities than any other airline"
"With more assets than any other bank"
"Featuring the best products in town"

The relevant test is **not** whether these statements are true. A statement can be truthful and still be comparative and therefore promotional. The issue is whether a statement compares the underwriter's products with those of its competitors. If it does, the statement is impermissible and will not be included in underwriter's acknowledgements.

2. Qualitative Language

As a general rule, donor acknowledgements that contain qualitative descriptions of the underwriter's products are not permitted. Qualitative descriptions include words that describe the features, benefits, advantages or other qualities offered by the underwriter's products or services. Examples of qualitative words are:

Fine Excellent Tasty Good

Examples of descriptions that include qualitative words are:

"Distributor of fine furniture:
"Builder of homes of distinction"
"With twenty convenient locations"

As mentioned under "comparative descriptions". Whether these statements are true makes no difference. If qualitative language is used to describe an underwriter's products or services, it probably serves to promote rather than identify the underwriter, and therefore would not be permissible.

3. Pricing Information

Announcements containing pricing information are not permitted. This includes interest rate information or other indications of savings or value associated with the product.

Examples of pricing information are:

“7.7% interest rate now available”
“Making computer power affordable at every desk”
“Office products at discount prices”

4. Calls to Action

Announcements that contain a “call to action” are not permitted. Most calls to action contain imperative language. That is a statement to the listener that tells him or her to take action.

Examples of calls to action are:

“Call us at 555-2222 for more information”
“Try Texaco next time you buy gasoline”
“Enjoy a night out at John’s Restaurant”

The FCC has indicated that a telephone number may be part of the permissible identifying information provided about an underwriter. However, it would not be permissible if its purpose and effect are promotional.

5. Inducements to Buy, Sell, Rent, or Lease

Announcements containing any inducement to buy, sell, rent or lease are not permissible. Language or descriptions that give reasons for doing business with the underwriter should be suspected of serving promotional rather than identification purposes.

Examples are:

“Six months free service”
“A bonus available this week only”
“Now offering free checking”
“With twenty stores nearby to save you time and money”

Additional Underwriting Policies:

6. The station does not accept corporate sponsorships which promote the use of illicit drugs, alcohol, tobacco, or firearms
7. The station does not accept political advertising
8. The station will produce all announcements with station voices

Additional decisions made on specific cases:

Here you would list copy that was deemed either legal or illegal bases on consulting an attorney or the NFCB, or others. They will help in future decisions. Perhaps a brief rationale would be included.