ChicagoPublicMedia
CHICAGO SUN-TIMES | WBEZCHICAGO

2026 Chicago Public Media Broadcast Underwriting Guidelines

I. Legal Background

Section 317 of the Communications Act requires NCE broadcasters to identify persons or entities that provide financial support for any aired messages. Section 399B of the Act prohibits noncommercial stations from airing "advertisements," which are defined as:

> Any message or other programming material which is broadcast or otherwise transmitted in exchange for any remuneration, and which is intended (1) to promote any service, facility, or product offered by any person who is engaged in such offering for profit; (2) to express the views of any person with respect to any matter of public importance or interest, or (3) to support or oppose any candidate for political office.

In implementing these statutory provisions, section 73.503 of the Federal Communications Commission's ("FCC's") rules state:

> No promotional announcements on behalf of for-profit entities shall be broadcast at any time in exchange for the receipt, in whole or in part, of consideration to the licensee, its principals, or employees. However, acknowledgements of contributions can be made. The scheduling of any announcements and acknowledgements may not interrupt regular programming.

The FCC enforces its underwriting rules, but the precedent is replete with exceptions and nuances. The vast majority of concrete guidance is derived from published FCC decisions (much of which is fairly old and involve obvious violations) and informal Commission guidance. As such, the line between permissible underwriting acknowledgements or announcements and impermissible advertising can be somewhat imprecise and arguably even subjective. If there is room for interpretation, the Commission will generally defer to the reasonable good faith judgment of the licensee as to whether underwriting spots identify, rather than promote, the underwriter.

II. When is an Underwriting Acknowledgement Required? Donors Who Support Specific Programming – Who to Include and How

A station must broadcast underwriting announcements if consideration (such as money, in-kind contributions, programming material, goods or services used for programming) is paid to support the production or acquisition of specific programming. Licensees must identify every donor that has paid consideration to support the production or broadcast of a particular program. Announcements must accurately include the name of the person or entity providing the consideration, for example if the "Jane & John Smith Family Foundation" provided the check, they must be referred to as the "Jane & John Smith Family Foundation," not simply "Jane & John Smith."

Underwriters for programs supported by numerous underwriters may be acknowledged in two ways:

1. Major underwriters must be acknowledged in the normal course.
2. Minor underwriters may be acknowledged in the normal course or the station may acknowledge them in a group (for example, "Friends of" the program) and maintain a list of these contributors in the station's public file.

Guidelines around co-op buys are covered in a later section.

For sponsors who want to include a second entity not providing consideration in the copy:

1. If the second entity is not a co-sponsor, it cannot be included in the preamble (i.e., "WBEZ is supported by…").
2. The second entity cannot be a for-profit company.
3. The second entity can be a non-profit entity that the entity providing the consideration supports or is working with so long as it is clear in the acknowledgement which entity actually provided the consideration.

III. Permissible Content of Announcements

Underwriting announcements may include the following information:

1. The name of the donor and/or its brand and trade name and product service listings;
2. Established slogans that are not overtly promotional in nature;
3. Value-neutral description of products or services;
4. Telephone number, location and website address; and
5. Non-promotional background information, such as how long the donor has been in business.

IV. Impermissible Content - Applicable to All Underwriters (For-Profit and Non-Profit Entities)

Underwriting announcements may not:

1. Express any person's views with respect to any matter of public importance or interests, or
2. Support or oppose any candidate for political office.

V. Impermissible Content – Applicable to For-Profit Underwriters

The announcements/acknowledgments of For-Profit underwriters may not include the following promotional content:

1. Any comparative, qualitative, or other promotional descriptions of products or services. The truth of a statement is not a defense if the statement is promotional;
    a. Examples of generally prohibited language include:
        i. Accommodating
        ii. Delightfully honest
        iii. Dependable
        iv. Efficient
        v. Economical
        vi. Five-star rating
        vii. Board-certified, but see 5(D)(7) below
        viii. Cheaper
        ix. Leading provider of…
        x. Reliable
        xi. Sale
        xii. Faster
        xiii. Adjectives ending in "-er" or "-est," such as "bigger" or "biggest"
        xiv. References to "stars" or other ratings systems, or awards

        xv. Quotes that imply a "review" of a performance or product
2. Any calls to action or inducements to buy, sell, or lease;
    a. Examples of generally prohibited language include:
        i. Do yourself a favor and come visit
        ii. Stop in today
        iii. While supplies last
        iv. Get your tickets now
        v. With every test drive you'll receive a pair of tickets.
        vi. Any mention of return policies or warranties
        vii. Free or complimentary offers
        viii. Invitations to visit a website or follow on social media
        ix. Call-out statements such as questions (e.g., "Want to know…?")

3. Any mention of price information, such as sales or savings, interest rates or discounts.
    a. Examples of generally prohibited language include:
        i. No down payment – up to $3000 in rebates
        ii. First time buyer's plan and preferred financing
        iii. On sale for a limited time only
            1. Note: Coupon and discount websites (like Groupon or Living Social) may be accepted as underwriters as long as the spot does not contain any prohibited information about pricing, specific discounts, etc.

Other Content Considerations

1. **Live Broadcasts.** Take care when broadcasting live from the underwriter's business not to include information that would otherwise be considered to be prohibited language (e.g., no mentions of special offers, quality of products, inducements to visit, no promotional language generally, etc.).

2. **"Non-identifying Verbosity."** Avoid repeating unnecessary and/or excessive repetition of otherwise permissible identifying information. Excessive repetitions of "Nissan of Temecula," for example, was found to constitute impermissible non-identifying verbosity.

3. **Excessively Detailed Menu Listings.** Avoid overly lengthy and detailed announcements that list a string of products ("we sell metal roofing, siding, hardware, trim, insulation, trusses, and gutters"); a list of 4 or fewer items is generally acceptable.

4. **No piggybacking.** Mentioning an entity who is not an underwriter in an underwriting announcement can be done only in limited circumstances. Some examples of permissible mentions include: Mentioning products offered by the underwriter, citing a location where an underwriter's product can be found, and mentioning a nonprofit that the underwriter supports (so long as it does not result in promoting the sponsor) are all generally acceptable, while simply promoting the goods/services of a third party is not. CPM's own in-house promos must also abide by this restriction (i.e., no mention of third-party websites unless there is a sponsorship arrangement).

5. **Underwriters are companies, not things or events.** An underwriter may be identified by its brand or trade name, but not by its product ("Brought to you by Kellogg's" is acceptable (assuming Kellogg's is, in fact, the sponsor), whereas "Brought to you by Fruit Loops" is not). For events, the name of the paying party (such as the production company) must be included in the announcement (e.g., "WBEZ is supported by Jam Productions, presenting Andrew Bird at the Chicago Theatre on July 1st.").

6. **Gambling, Alcohol and Tobacco.** Companies that manufacture tobacco products may be considered as underwriters as long as tobacco products are not mentioned. Casinos may be considered as underwriters as long as gambling-related activities are not mentioned. Finally, manufacturers of hard alcohol, beer and wine may be considered as underwriters, and their products may be mentioned.

7. **Categories v. Descriptions.** Terms that might appear to be qualitative or comparative in nature at first blush may be acceptable if they are being used instead to neutrally describe a commonly accepted category of goods or services.

    a. For example, "fine art," "smart phone," and "fast food" are categories of goods or services and are permissible.
    b. Further qualitative descriptions such as quality "fine art," sleek "smart phone," fast "fast food" are promotional descriptions and not permissible.

CPM Requirements Not Explicitly Required By FCC Rules/Precedent.

The items in italics are stylistic preferences. These requirements are not mandated by FCC Rules or precedent but are important to our listeners and members. Departures from these recommendations will be evaluated on a case by case basis. As issues arise, Traffic and Underwriting will work together to adhere to these guidelines and find solutions that are agreeable to CPM and to our sponsors. In the rare instance that a resolution is not possible, Traffic and Underwriting will present the copy to Legal Counsel, VP of Programming, and the Editor-in-Chief for their approval or denial. Chicago Public Media maintains the right to make final determination on all copy.

1. ***Use of Preamble.*** All Underwriting messages should be preceded by the following preamble: “WBEZ is supported by…”. Traffic/Programming can approve adjustments to the preamble on a case by case.

2. ***Co-op Underwriting*.** CPM accepts underwriting by sponsors that share underwriting costs (i.e., “supported by GM and Anheuser Busch”), as long as both entities are paying for the Underwriting.

3. ***Use of First or Second Pronouns.*** CPM does not allow the use of *“I, me, you, our and your”* in underwriting announcements. While not prohibited by FCC rules or precedent, non-commercial stations commonly restrict use of these words.

4. ***Underwriting by Advocacy Groups, Unions, Trade Associations, and Religious institutions.*** CPM accepts underwriters who describe their mission and services without advocacy. The following would be permissible: “Support comes from Illini for Affordable RX, a coalition led by pharmacy benefits managers who are working to reduce prescription drug costs for Illini. Learn more at Affordable RX Illini dot org.”

5. ***Recruitment Messaging.*** CPM allows for recruitment underwriting as long as the spot adheres to other restrictions, i.e., no calls to action (“Fill out an application today!”) or comparative language (“You’ll be happier working for us!”).

6. ***Location and Proximity.*** CPM recommends that mileage, rather than travel times, be used and that location information remain neutral (avoid phrases such as “just blocks from…” or “right off of…”).

7. ***Slogans and Taglines****.* The more qualitative the slogan, the more established it has to be. Examples of established slogans include: demonstrating that it has been in use for at least 6 months, trademarking of the slogan, and using the slogans in previous marketing materials. CPM also requires that taglines/slogans be the last element read in copy.

VI. Promoting Non-Profits.

CPM allows non-profits greater latitude in their Underwriting Messaging. These standards apply to these organizations: arts, education, healthcare, charitable organizations. This does not apply to trade associations who are discussed above. The onus is on the Corporate Sponsorship Account Executive to provide evidence that the entity has non-profit status by securing the entity's IRS Determination Letter, an IRS Form 990, or state registration. While providing latitude, the goal is to keep with the desired sound of a non-commercial station that our listeners have been accustomed to hearing.

1. CPM will allow limited price-related information to be used. This includes reference to refunds, discounts and use of the words affordable and complimentary. Reference to prices or use of the word "free" are not allowed.
2. CPM will allow non-profits limited promotion of their products and services.
    a. Copy is required to be about what the underwriter does or the event they are promoting
    b. If the copy contains qualitative adjectives/wording, this must be supported by the website referenced in the copy
    c. The copy cannot make it sound as if CPM is promoting the product or service
3. Non-profits may refer to reviews, rankings or awards received as well as limited descriptions of shows, productions, concerts and events. Examples:
    a. Medical or Education Accreditations: "Support comes from the Northwestern Memorial Hospital ranked number 1 in Chicago by US News & World Report."
    b. Arts: Words such as "Tony-winning," "Oscar-winning," "Golden Globe nominated".
    c. The reference cannot be from a paid post
    d. If the reference is for a ranking or review, it must be within the last 5 years
        i. Awards and nominations, such as Tonys, Oscar, etc. can be older than five years
4. CPM will allow limited calls to action for non-profits
    a. Learn more
    b. Learn how to help
    c. Learn how to support

        d. Ways to help/support
    5. Impermissible for all underwriters
        a. Expressing any person or entity's views with respect to any matter of public importance or interests
        b. Supporting or opposing any candidate for political office.
        c. Use of first or second person pronouns

VII. Timing, Frequency, and Duration of Underwriting Announcements

Stations may not alter, interrupt or suspend regular programming to broadcast underwriting announcements or donor acknowledgments. Announcements may be made at the beginning, end or between identifiable segments of the program or station breaks. As a general rule, the longer an announcement is, the more likely it is to be promotional. CPM guidelines allow 15-second spots, 15-second traffic sponsorships, and 30- second non-profit spotlights of 80 words or less. No announcements can exceed 30 seconds.

VIII. Escalation Process

In the event agreement regarding language in a script cannot be found, Traffic will begin the internal escalation process. If Traffic and the Account Executive are unable to edit the copy in a way the sponsor agrees with, Traffic will alert the VP of Corporate Sponsorship, Legal Counsel, VP of Programming, and Editor-in-Chief. Traffic will complete this Google Form and attach the full email chain as context for review. Legal Counsel, the VP of Programming, and Editor-in-Chief will review the copy and accept or deny it. The VP of Programming will email the aforementioned group with reasoning for acceptance or denial. Traffic will document reasoning and steps taken for future reference.

IX. FCC Enforcement of the Underwriting Rules/Penalties for Noncompliance

The FCC generally does not monitor the airwaves seeking violations of its underwriting rules; its enforcement process is driven by complaints filed by station listeners, competitors in the market and/or other interested parties. More often than not, complainants have been listeners concerned about what they perceive as "commercialization" of their local non-commercial station.

An FCC enforcement proceeding can include a variety of outcomes, including dismissal of the complaint, a fine issued against the licensee, or a voluntary settlement in which the FCC and the licensee enter into an agreement, called a consent decree, that may include a payment to the U.S. Treasury and steps to ensure future compliance. Most proceedings are settled through consent decrees, with settlement amounts historically ranging from $5,000 to $15,000. Of those cases that have resulted in the issuance of a forfeiture, penalties have ranged from $2,000 to over $100,000.

Revised July 2026