April 22, 2019

BEFORE THE GOVERNMENT ADMINISTRATION AND ELECTIONS COMMITTEE CONCERNING H.B. 7329

We the Connecticut Broadcasters Association and the Connecticut Daily Newspapers Association respectfully oppose H.B. 7329. While we support the concept of transparency in political advertising, the bill presents several problems for us:

The complexity of the bill would make it very difficult to understand and manage, creating the potential of unintentional noncompliance and, as a result, subjecting us to potential fines.

This bill would create costly administrative burdens, particularly for companies whose online/digital presence is secondary to their primary businesses, imposing government functions on enterprises already severely challenged by the rise of on-line media, thereby becoming a hidden tax on them and perversely increasing the competitive advantage of Internet-only media. Instead, the reporting requirements should apply only to those requesting or purchasing advertising (e.g., candidates and independent expenditure political committees), who are already in possession of the information the bill is seeking.

The bill proposes to require reporting for requests for advertising, as well as actual transactions. The number of requests for advertising for any entity that don’t come to fruition could number in the hundreds, if not thousands, making the reporting of those requests impractical and unrealistic.

The bill is intended to target big tech companies, which are currently unregulated, but includes publishers and broadcasters, the latter’s political advertising sales’ already being regulated.

The public disclosure of advertising rates could create a competitive disadvantage to any media companies that are soliciting sales of political advertising. The digital advertising marketplace is complex and published rates could be misleading, particularly if packaged with traditional time or space.

Thank you for your consideration.

CONNECITUCT BROADCASTERS ASSOC. CONNECTICUT DAILY NEWSPAPERS ASSOC.

BY ________________________________ BY ________________________________

Michael P. Ryan Chris VanDeHoef
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