# KNAU Arizona Public Radio Underwriting Policy

## Overview

It is the policy of KNAU to follow all relevant rules and regulations for Noncommercial Educational FM Broadcast Stations promulgated by the Federal Communications Commission and to comply with any guidelines set out by the Corporation for Public Broadcasting. We adhere to the following policies and practices concerning announcements Promoting Goods and Services, Underwriting, and Donor Acknowledgments. It is the policy of KNAU to follow the below guidelines.

## Underwriting Guidelines

Length

All underwriting credits shall be programmed for 20 seconds in length.

Timing

Underwriting credits shall be placed at the beginning or end of programs, between identifiable segments of longer programs, or in natural program breaks. At no time will underwriting credits interrupt regular programming.

Acceptance of Underwriters

Underwriters in the business of dispensing marijuana, selling tobacco or e-cigarettes, gambling*, sweepstake giveaways, online gambling or sports betting will not be accepted by KNAU.

*Casinos may be mentioned in general terms only, with no specific mention of gambling activities. A live entertainment performance or feature restaurant within the casino are examples of acceptable mentions.

**All underwriters are accepted at the discretion of KNAU and KNAU reserves the right to approve, edit, or reject all underwriting copy.**

## Content Guidelines

All persons paying for underwriting credits shall be identified as the sponsor of such programming. Each underwriting segment shall begin with "Funding for KNAU comes from" or "Support for KNAU comes from" as appropriate, followed by the underwriters identifying message. Credits will be given to the person or entity providing the support and will not be phrased to indicate that the sponsor is a product, service, or project of a person or business entity.

All underwriting content shall be produced by KNAU announcer staff and never pre-recorded by the sponsor.

## Contents of Underwriting Messaging

It is the policy of KNAU that underwriting messaging shall be designed to identify the underwriter and thank the underwriter for its support. Any KNAU staff engaged in producing, recording, or reviewing messaging content shall exercise reasonable, good faith

judgment regarding whether an underwriting announcement is promotional. The content of any underwriting messaging must respect and preserve the noncommercial nature of public radio. The content and context of underwriting credits must not suggest any influence by the underwriter over station programing or editorial decisions.

**Underwriting credits may only include the following content in any message:**

- Business name, operating division or parent company
- Business street location, phone number and/or website
- Value-neutral product or service descriptions
- Event dates and locations
- An established non-promotional corporate slogan
- Length of time in business

**Underwriting credits may not include the following content in any message:**

- References to quality of company, service, or products produced or served.
- References to reputation of company, service, or products produced or served.
- References that are comparative or superlative.
- References to exclusivity or uniqueness, including use of the word “only” where that word conveys an exclusive source for a product.
- References to quantity where that quantity implies quality or is otherwise promotional.
- References to or statements of price and price elements such as interest rates. This Includes the mentioning of “free” products or services.
- References or direct statements relating to the value of a product, discounts available, or opportunity for savings.
- Inducements to buy.
- Calls to action.
- Endorsements from individuals including KNAU content production staff.
- References to awards, achievements or certifications.
- References to underwriter or product success.
- References suggesting that a product or service is a solution to a listeners need.
- References to a satisfied customer.
- References to guarantees or warranties.
- Menu listings that are excessively detailed notations of products or services offered by the underwriter.
- References to an election or candidate for political office.
- References to a ballot initiative.
- References to an existing or prospective law, regulation or judicial decision in a context suggesting support or opposition to such law, regulation or decision.

**Underwriting Compliance Assurance Process**
All underwriters will be treated fairly and openly. Underwriters will be made aware of applicable rules and policies governing underwriting content in an approachable and easy to understand manner.

Sales Representatives will meet with station supporters to determine capacity to support and the nature of the underwriter's business. Based on these meetings the copy for acknowledgment shall be written by the sales representative and submitted to the Copy Editor of the station for approval. Prior to entering copy content for recording, the Radio Traffic Coordinator shall do a final review of the content to ensure the content of the message confirms with this policy.

Regular review for compliance of all copy aired in the previous 12 months since a previous full audit shall be done annually. A biannual test audit will be conducted after month 6 of each fiscal year concludes. A random sample containing no less than 10% underwriting acknowledgments aired during the current fiscal year will be reviewed for compliance. If compliance issues are found within the initial 10%, and additional 15% shall be sampled. If there are any compliance issues found within this 15% of samples, a full audit of current fiscal year underwriting copy shall be conducted.