



BY ELECTRONIC MAIL DELIVERY

WSYX/WTTE  
1261 Dublin Rd  
Columbus, Ohio 43215

Attention: Tony D'Angelo, General Manager

Dear Mr. D'Angelo,

I am acting on behalf of the Ohio Republican Party. Your station is currently airing an advertisement sponsored by candidate Allison Russo regarding her candidacy for the 15th Congressional District in Ohio. The political advertisement in question violates Section 315 [47 U.S.C. Section 315] of the Federal Communications Act of 1934 as amended and the Federal Election Commission law (FEC) CFR section 110.11.

By violating the below outlined sections of Section 315 of the Federal Communications Act, Ms. Russo forfeits her Lowest Unit Rate (LUR) advantage in her campaign advertisements.

Additionally, because Ms. Russo's political advertisement violates clear Federal Election Commission (FEC) law, the political advertisement must be pulled from your airwaves until the political advertisement and disclaimer follow current FEC laws.

Specifically, Section 315(b)(2)(C)(i) and (ii) under "TELEVISION BROADCASTS"—  
A candidate meets the requirements if, in the case of a television broadcast, at the end of such broadcast there appears simultaneously, for a period no less than 4 seconds- (i) a clearly identifiable photographic or similar image of the candidate.

The candidate does not appear on screen in her political ad for more than 4 seconds. She appears at the beginning of the political advertisement for almost 3 seconds and there is no "clearly identifiable photographic or similar image of the candidate."  
Additionally, there is no mention of who the "candidate" is at end of the campaign advertisement, which is required by statute.



As specified, (ii) a clearly readable printed statement, identifying the candidate and stating that the candidate has approved the broadcast and that the candidate's authorized committee paid for the broadcast.

As referenced above, Ms. Russo's political advertisement does not comply with Section 315 of the Federal Communications Act, and therefore Ms. Russo forfeits her LUR rights.

Additionally, as veteran broadcasters, I am sure you are aware of the Federal Elections Commission (FEC) rules identifying the need for a candidate's use of proper "disclaimers" approving his or her political advertisement. Specifically for reference, CFR section 11 CFR 110.11(c)(3)(ii) states the following:

"A communication transmitted through television or through any broadcast, cable, or satellite transmission, must include a statement that identifies the candidate and states that he or she has approved the communication."

The fact that Candidate Russo does not appear on screen in her political advertisement "more than 4 seconds..." is a clear violation of FCC and FEC law. Further, the candidate's political advertisement does not meet any of the below listed FCC and FEC requirements:

- 1) The candidate shall convey the statement either:
  - (A) Through an unobscured, full-screen view of himself or herself making the statement, or
  - (B) Through a voice-over by himself or herself, accompanied by a clearly identifiable photographic or similar image of the candidate. A photographic or similar image of the candidate shall be considered clearly identified if it is at least eighty (80) percent of the vertical screen height.
- 2) A communication transmitted through television or through any broadcast, cable, or satellite transmission, must also include a similar statement that must appear in clearly readable writing at the end of



the television communication. To be clearly readable, this statement must meet all of the following three requirements:

- (A) The statement must appear in letters equal to or greater than 4 percent of the vertical picture height;
- (B) The statement must be visible for a period of at least 4 seconds; and
- (C) The statement must appear with a reasonable degree of color contrast between the background and the text of the statement. A statement satisfies the color contrast requirement of this paragraph (c)(3)(iii)(C) if it is printed in black text on a white background or if the degree of color contrast between the background and the text of the statement is no less than the color contrast between the background and the largest type size used in the communication."

The lack of meeting standards set for all federal political candidates mandates that her political advertisement be pulled from your station's airwaves until it meets the clearly stated federal laws applying to all federal candidates for public office.

The Russo campaign's continued disregard for details violates federal guidelines and basic transparency to the voting public. The FCC and FEC rules and regulations are there for a distinct purpose that the Russo campaign fails to follow.

Thank you for your attention to our formal complaint regarding the Russo campaign's political advertisement for Ohio's 15th Congressional District, and its clear violations of both the FCC and the FEC laws.

Justin Bis  
Executive Director  
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