

**TO:** ALL COUNTY PERSONNEL  
**FROM:** ROBERT WEISMAN, P.E.  
COUNTY ADMINISTRATOR  
**PREPARED BY:** PUBLIC AFFAIRS DEPARTMENT, CHANNEL 20  
**SUBJECT:** CHANNEL 20 SPONSORSHIP POLICY  
**PPM:** CW-O-053

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**ISSUE DATE**  
March 26, 2013

**EFFECTIVE DATE**  
March 26, 2013

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**PURPOSE:**

To establish policy and procedures for donations of goods and services for use by Palm Beach County Channel 20; and to establish policy and procedures for underwriting of Channel 20 programming.

**UPDATES:**

Future updates to this PPM will be the responsibility of the Manager of Channel 20 under the authority of the Director of Public Affairs.

**AUTHORITY:**

In the Matter of Commission Policy Concerning the Noncommercial Nature of Educational Broadcasting, 1992 Reprint excerpted from Public Notice, April 11, 1986 (FCC 86-161), which was published at 51 Federal Register 21800, June 16, 1986, 7 FCC Record 827.

**POLICY:**

It is the policy of Channel 20 to accept the donation of goods and services by individuals or organizations in accordance with this PPM and all applicable laws. It is also the policy of Channel 20 to allow individuals and organizations to underwrite all or a part of costs of purchasing and/or producing Channel 20 programming in accordance with this PPM and all applicable laws.

**PROCEDURES:**

A. Donation of Goods and Services

Any individual, business, or organization that donates goods and services shall be acknowledged in accordance with the procedures found in Part C of the

Procedures section of this PPM. A donation of goods or services for one particular program shall be identified by an announcement attached to that program. A donation of goods or services to Channel 20 in general shall be identified by an announcement attached to a program chosen by Channel 20. The County shall not accept the donation of goods or services for any program airing official County business (for example, Board of County Commissioners meetings). All donations of goods and services must be recorded on a Sponsorship Disclosure form provided by Channel 20. A sample of the form is attached hereto as Exhibit "A."

B. Underwriting of Program Costs

The County shall accept the underwriting of all or a part of its programming costs in accordance with this PPM. Program underwriting by outside organizations provides a way for Channel 20 to develop and acquire programming. Channel 20 wishes to identify the underwriters of its programming in a manner compliant with rules promulgated by the Federal Communications Commission. Any individual, business, or organization that underwrites all or a part of the expenses related to a particular program shall be acknowledged in accordance with the procedures found in Part C of the Procedures section of this PPM. The County shall not accept the underwriting of any program airing official County business (for example, Board of County Commissioners meetings). All donations for program underwriting must be recorded on a Sponsorship Disclosure form provided by Channel 20. A sample of the form is attached hereto as Exhibit "A." An individual, business, or organization shall be permitted to underwrite programs on either an exclusive or non-exclusive basis. For purposes of this PPM, one program shall include the original airing and any subsequent rearings of the program.

1. Public Affairs/Channel 20 will establish underwriter/sponsorship rates to recover the full cost of program production. The full cost will include the direct cost of the particular program being considered by the underwriter for sponsorship. Each program will have an established exclusive and non-exclusive underwriter/sponsorship rate that consists of staff time, equipment and materials used to produce the program.
2. An exclusive underwriter/sponsorship allows for the recovery of the full cost of program production from one donor, individual, business or organization.
3. A non-exclusive underwriter/sponsorship allows for the recovery of the full cost of program production from more than one donor, individual, business or organization.

C. Procedures for Donation of Good and Services/Underwriting Announcements

Channel 20 will air an announcement identifying the donor of goods or services

(hereinafter referred to as the “Donor”) or the underwriter of a program (hereinafter referred to as the “Underwriter.”) For an exclusive Underwriter, said announcement shall not exceed thirty (30) seconds at the beginning of the program and thirty (30) seconds at the end of the program. For a shared Underwriter, or a Donor, the announcement shall not exceed more than ten (10) seconds, and shall air at either the beginning or the end of the program. There shall be no more than sixty (60) seconds of Donor/Underwriter announcements per program. The purpose of the announcement is to promote or to clearly identify the Donor/Underwriter, not to promote or sell its product or service. Said announcements are subject to the following provisions:

1. Announcements shall be made for identification purposes only, and may identify, but not promote, the Donor’s/Underwriter’s products, services, or company.
2. Comparative descriptions of the Donor’s/Underwriter’s products are prohibited. Comparative descriptions are language comparing Donor’s/Underwriter’s products or services with those of competitors. Examples of comparative descriptions are:
  - “Serving more cities than any other airline”
  - “With more assets than any other bank in town”
  - “Featuring the best products in town”
3. Qualitative descriptions that contain descriptions of the Donor’s/Underwriter’s product or service are prohibited. Qualitative descriptions include words that describe the features, benefits, advantages or other qualities offered by Donor’s/Underwriter’s product or service. Examples of qualitative descriptions are:
  - “A leading supplier of automobiles”
  - “With 20 convenient locations”
4. Mascots and other symbolic figures that have been developed as a corporate (rather than product) symbol and are used to identify the Donor/Underwriter are permissible in either “live video” or animation. An example would be the Merrill-Lynch bull. Mascots or other symbolic figures that are used solely for product identification (such as Tony the Tiger for Kellogg’s Frosted Flakes) are prohibited, unless they happen to appear on a specific product that is depicted.
5. Announcements that contain logos or logograms used to identify the Donor’s/Underwriter’s business are permissible, as long as they do not contain comparative or qualitative descriptions of the Donor’s/Underwriter’s products or services.

6. Use of official spokespersons, endorsements, or professional talent that is featured in commercial promotion of a business or product is prohibited.
7. Use of personal pronouns in an announcement is prohibited.
8. Sound effects intended to promote or depict a product in use are prohibited.
9. Music with lyrics is prohibited. This does not preclude use of musical signatures that are part of a company's corporate identity, provided the signature is not an advertising jingle.
10. Announcements which contain general product-line descriptions are permissible if not designed to be promotional in nature.
11. Visual depictions of specific products are permissible. However, products depicted should not be shown in use or operation (i.e., a pair of shoes is acceptable; a person wearing the shoes is not.)
12. Donor's/Underwriter's telephone numbers and web addresses are permissible.
13. Announcements containing price information are prohibited. This includes any announcement of interest rate information or other indication of savings or value associated with the product. An example of such announcement is:
  - “From \$199 a month”
  - “7.7% interest rate available now.”
14. Announcements containing a call to action are prohibited. Examples of such announcements are:
  - “Stop by our showroom to see a model”;
  - “Try product X next time you buy oil.”
15. Announcements containing an inducement to buy, sell, rent, or lease are prohibited. Examples of such announcements are:
  - “Six months' free service”;
  - “A bonus available this week”;
  - “Special gift for the first 50 visitors.”
16. All announcements shall be approved by the County Attorney's Office.
17. Notwithstanding any of the above conditions, the County shall be the final determiner of the suitability of any announcement for airing on Channel 20.

18. Announcements containing any obscene or indecent material are prohibited.
19. Announcements promoting the sale of tobacco products, alcohol, or firearms are prohibited.



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**ROBERT WEISMAN**  
**COUNTY ADMINISTRATOR**

**Supersession History:**

1. PPM #CW-O-053, issued 11/1/1993

**CHANNEL 20 SPONSORSHIP DISCLOSURE**  
**Exhibit "A"**

**Organization Name:** \_\_\_\_\_

**Address:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Desired Sponsorship Level:**

**Circle One** - Exclusive Underwriter \$ \_\_\_\_\_ / Non-Exclusive Underwriter \$ \_\_\_\_\_

**Program To Be Underwritten:** \_\_\_\_\_

**Goods / Services Offered:** \_\_\_\_\_

**Contact Name:** \_\_\_\_\_

**Contact Number:** \_\_\_\_\_

**E-mail Address:** \_\_\_\_\_

**Proposed donor/underwriter identification announcement (subject to County approval)**

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\_\_\_\_\_

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I have reviewed the Palm Beach County Code of Ethics (Palm Beach County Code Section 2-441 through 2-448, as may be amended) prior to entering into this agreement to: (a) determine whether there are any prohibitions to entering this agreement; and (b) become familiar with the general provisions of the Code of Ethics.

\_\_\_\_\_  
**Print Name of Authorized Underwriter Above**

\_\_\_\_\_  
**Authorized Underwriter Signature Above**

\_\_\_\_\_  
**Date**

\_\_\_\_\_  
**Palm Beach County Public Affairs Director**

\_\_\_\_\_  
**Date**