

## **OPB Sponsorship Policy**

Adopted by the Board of Directors October 14, 2025

### **1. Background**

OPB is an Oregon nonprofit corporation that provides robust digital content across many platforms, and operates television and radio stations, pursuant to noncommercial educational licenses issued by the Federal Communications Commission (“FCC”). To maintain the integrity of the licenses, all television or radio stations programmed by OPB must be operated in conformance with all applicable laws, including FCC rules.

Public broadcasting depends on public support, a significant portion of which comes from underwriters, also known as sponsors. By law, when a public broadcaster accepts funding from a sponsor, it must identify the sponsor without broadcasting any “advertisement” on its behalf. While the FCC periodically issues decisions that help illustrate what constitutes an impermissibly “promotional” announcement, ultimately, public broadcasting stations are charged with the good faith, discretionary responsibility to decide whether an announcement advertises on behalf of the sponsor. Therefore, the consistency and credibility of OPB’s sponsorship practices affects both its ability to comply with the law and to successfully raise funds. To help ensure this consistency, OPB applies this Sponsorship Policy to all of its content distribution platforms.

OPB has an excellent record in attracting sponsors and in complying with the law. Public media in general is recognized for high quality and reliability, maintaining high standards of journalism and public service. This motivates sponsors to make financial commitments to public media organizations such as OPB. In turn, OPB must treat those sponsors fairly by making them aware of FCC rules and other guidelines and ensuring their understanding of the public broadcasting environment in which audiences hear or see acknowledgment of their support. In this Policy, any acknowledgement of sponsor support on any OPB distribution platform will be referred to as a “sponsor message.”

### **2. Policy Purpose**

OPB recognizes its duty to determine which programming and on-air material will best serve the public interest and maintain the noncommercial nature of public broadcasting. To that end, OPB retains discretion over the format, subject matter, duration, and scheduling of all broadcast material, including sponsor messages. The purpose of this policy is to ensure that OPB:

- (a) Continues to earn the public’s trust.
- (b) Complies with FCC underwriting/sponsorship rules and regulations and all other applicable laws.
- (c) Reviews public broadcasting resources, such as the Public Broadcasting Service (“PBS”) and National Public Radio (“NPR”) sponsorship guidelines, to ensure consistency in OPB’s sponsor messages.

- (d) Makes sponsorship decisions in the best interests of OPB's mission, values, and business needs.
- (e) Provides sufficient recognition to sponsors to encourage their support in providing OPB's public service.
- (f) Ensures separation of sponsor interests and editorial interests.

### **3. Review and Revision of Sponsor Messages**

- (a) OPB will review every proposed sponsorship for compliance with this Policy.
- (b) OPB will require revisions to proposed sponsor messages to the extent it deems necessary to comply with FCC rules and regulations, all other applicable laws, and, where appropriate, the guidelines issued by PBS and NPR.
- (c) OPB will require revisions to proposed sponsor messages to the extent OPB deems advisable in view of OPB's sponsorship goals, business needs, and the public interest.
- (d) OPB will be particularly cognizant of special considerations underlying messages directed at children or aired during children's programming and OPB may, using its discretion, reject, require revisions to, or require rescheduling of, sponsor messages that would air during or adjacent to children's programming.

### **4. Restricted Categories**

- (a) OPB reserves the right to reject any sponsor and/or sponsor message for any reason OPB deems appropriate and in the interest of its audience and members. All material that is broadcast or otherwise made public by OPB must be legal and in conformance with OPB policies. Furthermore, in keeping with its role as a trusted source of journalism and other original content about our region, and quality programs curated for our audience, it is OPB's policy to decline funding from potential sponsors who might be perceived as influencing or interfering with the accurate, impartial, professional creation of content for OPB's news coverage or programming.

Accordingly, and without limiting the scope of its discretion, OPB does not accept sponsor messages:

- That require specialized legal review; i.e., sponsor messages referring to "adult" products or services, tobacco products, nicotine-delivery products, any drug classified under Schedule I of the Controlled Substance Act, including marijuana, firearms, or gambling activities (except legal lotteries run by the states of Oregon and Washington);
- From organizations or individuals whose activities are illegal;
- If doing so would violate an established OPB policy (e.g., Nondiscrimination Policy, Employee Ethics Policy, Conflict of Interest Policy, Editorial Policy);

- From political parties or political candidates; or from individuals or organizations working to influence elections, legislation, or regulatory outcomes if, in OPB's sole discretion, a Reasonable Community Member would find the message to be primarily political in content or tone;
  - From religiously affiliated organizations, if, in OPB's sole discretion, a Reasonable Community Member would find the message to be primarily religious in content or tone;
  - With sectarian language or imagery; or with violent language or imagery.
- (b) FCC regulations do not apply to digital sponsorship ads. However, IRS regulations and other laws may apply. Accordingly, OPB reserves the right to reject any digital sponsor and/or sponsor message or require revision of any digital sponsorship ad for any reason OPB deems appropriate and in the interest of its audience and members.
- (c) In exercising its discretion to accept or reject particular sponsors or sponsor messages, OPB will adhere to the OPB Editorial Policy which, among other things, requires OPB staff to remain independent from the undue influence of any internal or external source.

## **5. The "Reasonable Community Member" Standard**

Certain sponsorships will be evaluated as described above by applying a "Reasonable Community Member" standard. In deciding whether to accept or decline sponsorship on the basis of political or religious content, OPB Management will consider whether a Reasonable Community Member would find the sponsor message to be primarily political or religious in content or tone.

## **6. Oversight**

- (a) OPB Management will be responsible for day-to-day sponsorship content and decisions.
- (b) OPB Management will draft detailed procedures when and as necessary for staff to follow to ensure compliance with this Policy.
- (c) OPB Management will exercise appropriate oversight to ensure that OPB staff comply in all material regards with this Policy.

If a particular sponsorship decision may have a significant public impact in a manner that puts OPB's reputation at risk, has a disproportionate negative impact on OPB's journalistic integrity or financial stability, or is otherwise inconsistent with OPB's stated values, OPB Management will consult in advance with the Board of Directors, if possible; otherwise OPB Management will notify the Board within a reasonable period of time.

OPB Senior Leadership will review as needed, specific sponsors and sponsorship content that may have significant public impact or be deemed controversial.

(d) This Policy will be reviewed as needed by the Board of Directors.