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Christian Communicators Impacting the World

October 9, 2014

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Petition by Professor John Banzhaf to Deny Renewal of WWXX-FM's Broadcaster License

Dear Chairman Wheeler:

On behalf of the National Religious Broadcasters (NRB), I write to you regarding the petition filed in September by George Washington University Law School Professor John Banzhaf challenging the broadcasting license of WWXX-FM, the flagship radio station of the Washington Redskins professional football team. In particular, I wish to thank you for re-emphasizing in your recent opinion piece in the *Los Angeles Times* the FCC's commitment to the free expression principles of the First Amendment, even in the midst of such an extremely passionate and sensitive debate in our nation.

While most public attention has focused on whether the team name "Redskins" is inherently derogatory and able to be categorized as obscene or profane for broadcast purposes, I am alarmed that Professor Banzhaf's petition went further by declaring the use of this team name to be "hate speech." Such an allegation is very serious, yet difficult since "hate speech" seems to be a nebulous term in our society. The petitioner himself appears to imply as much by stating, "the general topic of 'hate speech' is so broad and complex, potentially covering many different types of words and statements, and many different types of harm as to which the causal connection may be vague if not indeed nonexistent."

What constitutes true "hate speech" is convoluted, yet the connotations of such an accusation are extremely grave. Sadly, this term has been used recklessly by some in our nation and other democracies in an attempt to expunge opposing viewpoints from the marketplace of ideas. Truly, I have been shocked by stories outside the United States of government-sanctioned censoring and censuring of religious broadcasts in the name of squashing such an ambiguous "threat."

As the Commission considers the merits of this petition, I urge you, in accordance with the Bill of Rights, to reject this petition's call for a federal proceeding to investigate "to what extent is it appropriate if not necessary for the FCC to consider if not oversee such 'hate speech.'"

Thank you for your consideration and your leadership of the Federal Communications Commission.

Respectfully,

Jerry A. Johnson, Ph.D.
President & CEO