About your presenter

• 36 years as an engineer with FCC
• Specialized in TV/FM/CATV for many yrs
• Conducted over 1000 broadcast inspections
• District Director of a 4 state region
Planning for and Surviving an FCC Inspection

How to avoid the FCC’s wrath!
Objectives

• Identify the most violated FCC rules
• State violations causing fines
• Learn what to expect at an FCC inspection
• Name the documents needed at station
• Describe the most common pitfalls
Administrative

• License and renewal
• Telephone access
  – Local number
• Main Studio Location & Presence
  – 8 hours, licensed community
• Chief Operator Designation
• Station Logs & Records
  – Equipment Performance Measurements
Chief Operator

- Check EAS logs weekly & **sign & date**
- Log any Tower light outages
- Log out any EAS equipment not working
- Chief designation letter **posted**
Public Inspection File

- Maintained?
- At Studio?
- Public Access?
- Applications to FCC
- Contour Maps
- Ownership Reports
- Political File
  - Even if free
- EEO report
- Issues-Program Lists
  - Quarterly
Public Inspection File

- Donor Lists (NC)
- Each item has its own retention period

- Quarterly Issues/Programs lists are the most violated public inspection file item
- Must have program description, time, date and duration of program
Towers

- Is it registered?
- Is the Antenna Structure Registration Number (ASRN) posted?
- Does the height match?
- Does the Antenna type match station license?
- Is it at the correct coordinates?
- Are the lights observed once every day?
ASRN Signage

Good ASRN sign
Towers

• Painting and lighting match?
  – Painted/lighted or Strobes?
• Light out?
  – Call FAA  877-487-6867
  – Log in Station Records!!!
Most violated

- #1. A flashing light is out and has not been reported to the FAA
- #2. No Sign with the antenna registration number
- #3. Paint is chipped and faded
Tower Painting

Is this tower paint ok?
EAS Equipment

- EAS equipment installed?
  - CAP implemented?
  - Monitoring 2 stations
    - Correct 2 stations? (State Plan)
    - Automatic or manual mode
      - Can be accessed from operator position when manual
  - Class D exception on encoder
Where’s the connections?
• Send one weekly (Required Weekly Test)
  – Log it!

• Receive two weekly
  – Log them both!

• Required Monthly Test (RMT)
  – Does Equipment retransmit RMT?
  – Log it!

• EAS Operation Handbook
EAS Tests

Not a recommended logging practice
Most Violated Rules

#1. Equipment not installed or not working
#2. Not monitoring two sources
#3. Not logging tests/activations sent and received
Station Log

- EAS Tests Sent
  - Log
- EAS Tests Received (weekly and monthly)
  - Log
- Tests you didn’t receive or send
  - Log why!
- EAS Equipment Failure
  - Log! When failed and when repaired
Station Log

• Tower light outages
  – Log (when out and when repaired)
    • Good place to document call to FAA

• Equipment calibration
  – Date and adjustment or replacement
At the Transmitter

• Power (within 90-105%?)
  – Direct method-read meter in %
  – Indirect method
    • Multiply final voltage by final current by efficiency factor
      – Ep x Ip x F
    • Have efficiency factor on hand

• Frequency (+/- 2000 Hz)
• Modulation (= or < 100%)
At the Transmitter

• Metering?
  – Have what’s needed to keep power, frequency, and modulation within requirements

• Control
  – Can you control the transmitter?
    • “Turn it off, you have 3 minutes!”
    • Local transmitters
    • Remote transmitters
Keeping the tuning house squeaky clean
At the Transmitter

- Equipment Calibration-periodic no time specified
  - Log
This station could not make power...why?
“Blazin’ 102.5, we’re smokin’!”
Number 5

AM Base Fence

AM stations must have a fence around the base of the tower with a locked gate.
Base Fence

Not so good
Base Fence

Not so good
FCC Top 5 List

Number 4
Tower Painting and Lighting

- Must be painted and lighted as stated in the Antenna Structure Registration database.

- Above should agree with license
FCC Top 5 List

Number 3
EAS Equipment

- Must be properly installed
- Monitoring two sources other than weather bureau
- Can send and receive tests and alerts
- Is CAP compliant and connected to internet
- ALL tests and activations logged
FCC Top 5 List

Number 2
Public Inspection File

- Available during business hours!
- Issues/program list each quarter
- Ownership reports
- Political files complete-request, disposition, charges
- Donor lists
FCC Top 5 List

Number 1
Pirate Broadcaster

➢ Unlicensed operation
➢ We find and we fine!
➢ Don’t be fooled, almost no FM transmitter out there is legal without a license
Pirate Station
Sanctions

- Advise
- Notice Of Violation (NOV)
- Notice Of Unlicensed Operation (NOUO)
- Notice of Apparent Liability (NAL) $$ $$
Resources

• Self Inspection Checklist
  http://transition.fcc.gov/eb/bc-chklsts/

• FCC Rules:
  http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=/ecfrbrowse/Title47/47tab_02.tpl

• Alternate Broadcast Inspection Program
  – Contact me to get in touch with inspectors
Resources

• EAS Operations Handbook:

• Public And Broadcasting (required in PIF)
Contact me or my office if you have any questions!

Doug Miller
770-935-3370