

## **UNATTENDED OPERATION**

**OCTOBER 2012**

### **BACKGROUND**

In 1995, under MM Docket 94-130, the Commission adopted new rules which permitted broadcast facilities to operate without the physical presence of an individual to ensure that the facility's transmitter was performing as licensed. The common term coined for this type of station functioning is "unattended operation." This was done in recognition of the advances in technology that had been made in the reliability of both transmitters as well as remote control systems. These advances notwithstanding, certain standards are still in place to ensure that the station is operating within its authorized parameters as well as complying with EAS requirements and the ability to respond quickly to any complaints of interference on out-of-tolerance operation.

In order to aid in a greater understanding of FCC requirements with respect to remote control operation, a summary of the Rules follows below.

- 1) Although specific parameter logging or monitoring requirements (i.e., transmitter, DA system, monitor point and tower lighting) are no longer required by the FCC the licensee must insure that the station's authorization (license) is adhered to at all times. (Recommendation: Even though logging of operating parameters is not required, stations are still required to operate within proper tolerances. Stations should continue to log parameters to show a history of compliance during an FCC inspection.)
- 2) Authorized personnel may adjust the transmission system by phone, internet, etc., from any location. A dedicated, dial up phone line must be installed for transmitter control purposes.
- 3) For unattended operation, a designated duty operator is not required. However, the licensee must be in control of the transmitter at all times. The Rules require that a station be able to turn the transmitter off within 3 minutes if interference occurs. Examples of interference include an AM array operating out of tolerance or mode and contact by the FCC. (Recommendation: Stations should employ a remote control system with limits programmed into the unit so that the chief operator, and additional personnel as necessary, can be notified in case of an out-of-tolerance condition. When unattended, stations should provide a means for ready telephone contact from the FCC and the public.)

- 4) Out of tolerance conditions, such as excessive modulation or transmitter power, must be corrected within three hours or the station must shut down. (Recommendation: See above.)
- 5) Automatic alarms must be directed to a person, or persons, selected by the licensee. If a corrective response is not received by the remote control master equipment within three hours, the remote control should shut the transmitter off automatically. All stations must have the capability of shutting down within three minutes of receiving an FCC request due to interference.
- 6) If remote monitoring fails, and is not restored within three hours, the station must place an operator at the transmitter site or the station must shut down. Any out of tolerance situation with interference potential, which cannot be resolved manually, requires the station to shut down immediately.
- 7) Tower lights must be monitored on a daily basis. In the event that the entire tower lighting system fails, or any portion thereof, the FAA must be notified within 30 minutes of the failure. (Recommendation: Stations should monitor tower lights with the remote control and set up a call out alarm for a malfunction condition.)
- 8) EAS alerts and tests must continue to be able to be received, retransmitted and logged.
- 9) Station logs should record any out-of-tolerance condition (including malfunctioning tower lighting) and the corrective action taken. These entries should be recorded by the designated operator and the logs are to be retained for at least two years.

Over the years, the FCC has been known to assess some very hefty fines for various rule violations so these relatively simple and cost effective efforts are well worth implementing.

Stations which choose to continue using operators no longer need to utilize licensed operators (typically holding a restricted permit). However, the Chief Operator requirements remain, in that each station must designate a Chief Operator, as well as an alternate, to be available when the Chief Operator is not available.

With respect to unattended operation and EAS/CAP, the new rules became effective on April 23, 2012 and require that CAP compliant equipment be installed and operational as of June 30, 2012. All stations are required to have EAS decoders. Class D FM, LPFM and low power TV stations are not required to have EAS encoders. In the case of an emergency, a non participating station would direct listeners to tune to a participating EAS station and go silent during the relaying of the EAS message.

Specifics related to the implementation requirements of EAS/CAP and/or unattended operation should be addressed by your FCC legal counsel, qualified contract or chief engineer or consulting engineer.

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