

The
Society of Broadcast Engineers
And The
National Association of Broadcasters



**AM Broadcast Station
Self-Inspection Guide**

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AM Self-Inspection Guide

The Society of Broadcast Engineers

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WELCOME TO THE AM BROADCAST STATION SELF-INSPECTION GUIDE

Understanding and complying with Federal Communications Commission (“FCC” or “Commission”) rules and policies is no easy task. Up until 2003, the FCC published checklists to assist broadcasters in conducting a self-inspection of their station. While the Commission’s rules are constantly changing, the FCC has not updated those checklists in over 20 years. As a result, the [Society of Broadcast Engineers](#) (SBE) and [National Association of Broadcasters](#) (NAB) have joined with other organizations to provide coherent, standardized guidance toward compliance with the FCC’s rules and policies for the benefit of broadcasters.

It is important that broadcasters abide by the FCC’s rules, for the benefit of a station itself, as well as for the public perception of broadcasting. Rules violations can lead to delays in the FCC’s processing of an application and to penalties including a substantial monetary forfeiture, a shorter approved license authorization, or even loss of a station’s broadcast license. Thus, it is critical that station management support efforts to adhere to these practices. It is also important that the stations wishing to use these guides work in conjunction with their staff, engineering consultants, legal consultants and ABIP inspectors to ensure compliant operation.

The intent of this document is to highlight and summarize the significant Commission rules that station engineers and others responsible for compliance should be familiar with, as well as to provide guidance and practical advice for compliance with the FCC Rules and regulations and policies. This document is an educational effort that has been supported by many individuals within the [SBE](#), the NAB, and the broadcast industry.

This document has been developed to assist broadcast station management and engineers in conducting a self-inspection of their station. It provides an opportunity for a broadcaster to review and correct any deficiencies associated with the operation of a station without an actual, on-scene visit by the FCC.

This document is also intended for use by those engaged in the Alternative Broadcast Inspection Program (ABIP). The ABIP program was established in 1996 by the FCC and various state broadcast associations to allow broadcast stations to identify and correct potential compliance gaps on their own. This program has proven to be very effective in fostering compliance through self-regulation while minimizing the potential for fines and penalties. To that end, the [SBE](#) and the [NAB](#) urge broadcasters to take advantage of the ABIP.

While not all broadcast regulations are covered by this guide, stations should be able to assess their compliance with the regulations that are most likely to pose an enforcement risk and take advantage of the recommended practices. Each question contains a reference to the relevant rule section(s) of the FCC’s rules that can be found in Title 47 of the Code of Federal Regulations along with other references to industry standards. These guides are available for each broadcast service (AM, FM, TV (including Class A), LPFM and translators). Not every question within a specific guide will apply to every situation. In addition, the [SBE](#) has added its recommendations for “Recommended Practices” (RP) where applicable.

RP	<i>SBE’s recommended practice will appear in this box, when applicable.</i>
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Stations should also be aware that there is a large body of administrative law, policy and interpretation that may apply in specific situations. The recommendations provided in this guide are not intended as, and should not be construed as, legal advice or legal opinion. Stations are strongly advised to consult with their regulatory counsel and experts regarding all FCC compliance issues, as each station’s unique factual circumstances can affect the applicability of the items set forth herein.

We wish to thank the SBE Alternative Broadcast Inspection Program committee.

Steve Campbell – Entronics
Jeff Juniet – Cox Media Group, WFTV
Jason Ornellas – Bonneville International Media

David Ratener – Salem Media
Tom Ray – Tom Ray Broadcast Consulting,
LLP
Shane Toven – ST Broadcast Associates

We also wish to thank the SBE and NAB staffs and all those involved in producing and maintaining these documents.

Sincerely,

Charles (Ched) Keiler, CPBE
Chair, Society of Broadcast Engineers Government Relations Committee

Robert Weller P.E., CPBE
Vice-President, Spectrum Policy
National Association of Broadcasters

GUIDE USE

Each item in this Guide contains a comment line much like:



The Checkboxes are Y for Yes (in compliance), P for Pending corrective action and N/A for Not Applicable to the current situation. The blank line is for notes, and it is suggested that a short note be included for all P-Pending and N/A-Not Applicable items for reference or explanation. As this is a Self-Inspection Guide, please do not send the completed form to the FCC or the SBE or upload it to your FCC-hosted online Public Inspection File (PIF), but you may retain it in your internal files for reference and review.

The following resources may be helpful to resolving any questions that arise during this review:

- 1) Almost all items have a reference(s) for further information. The references prefixed with § refer to sections of the FCC Rules and Regulations (FCC-R&R) and include hyperlinks to the Electronic Code of Federal Regulations (eCFR). The eCFR can be found at www.ecfr.gov/current/title-47 .
 - a) Rules applying to Radio and TV stations are generally in [Part 73](#).
 - b) Rules applying to translators, boosters and Broadcast Auxiliary Services (BAS) are in [Part 74](#).
 - c) Rules applying to Emergency Alerting System (EAS) are in [Part 11](#).
 - d) Rules applying to Tower Lighting and Painting are in [Part 17](#) and the appropriate [FAA 70-7460](#).
- 2) The FCC maintains extensive information about all facets of its operation on its web site, FCC.GOV.
 - a) The Media Bureau of the FCC is responsible for regulating over the air broadcast operations and is at [FCC Media](#) with its Audio Division (Radio) at [FCC Audio](#) and its Video Division (Television) at [FCC Video](#).
 - b) Information about Main Station Licenses can be found at the FCC's License Management System, [FCC LMS](#). Unsigned copies of the Main Station Authorization can usually be downloaded from this site by opening the last License to Cover or Modification Application and accessing the Authorization Link.
 - c) Information about Antenna Structure Registrations can be found at [FCC ASR](#). Searches for ASR records can be found at [FCC ASR Search](#). Reference Copies of ASRs can be downloaded from the search site.
 - d) Information about Broadcast Auxiliary Services (BAS), which include Studio Transmitter Links (STL), Intercity Relay Links (ICR) and Remote Pickup Units (RPU) as well as other Wireless Telecom licenses can be found at the FCC's Universal Licensing System (ULS), operated by its Wireless Telecommunications Bureau, [FCC ULS](#). Licenses for BAS and other Telecom Services can be located at [FCC WTB Search](#) and Reference Copies of the licenses can be downloaded from this site.
 - e) Information on FCC Equal Employment Opportunity (EEO) matters can be found at [FCC EEO](#).
 - f) FCC information about EAS matters can be obtained at [FCC EAS](#) or the FCC Public Safety and Homeland Security Bureau [FCC PSHS](#).

- g) The FCC maintains a National Call Center at 888-CALLFCC (888-225-5322) which can be of assistance.
 - h) The FCC maintains a web site to search its databases of documents, rulemaking procedures, speeches, and fact sheets at [FCC EDOCS](#).
 - i) The FCC also maintains a web site to search its databases of docketed rulemakings, including NPRMs, Orders, and comments filed at ECFS.
- 3) A station's FCC legal counsel and consulting engineering firm should be the primary, definitive resource for station compliance questions.
 - 4) The Society of Broadcast Engineers ([SBE](#)) and The National Association of Broadcasters ([NAB](#)) also provide useful information and publications that can assist in broadcast rule compliance and additional Recommended Practices for excellent broadcast quality.
 - 5) The inspector who last worked with your station for the ABIP program is a good source of information to answer compliance questions.

For this document, '§' references the Code of Federal Regulations for Telecommunications (47 CFR). See Appendix III for the list of all Hyperlinks for each abbreviation.

* * * * *

This Guide has not been approved or endorsed by the FCC.

This Guide should in no way be construed as legal advice or a legal opinion on any specific set of facts or circumstances. Therefore, you should consult with legal counsel concerning any specific set of facts or circumstances.

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SECTION I: ADMINISTRATIVE AND NON-TECHNICAL

A. AUTHORIZATIONS

1. TERMS OF STATION AUTHORIZATION (TSA)

The station license, construction permit, renewal certificate, auxiliary transmitter authorization, special temporary authorization (STA), and/or any other instrument of authorization are no longer required to be posted at the studio. However, as stations are required to maintain facilities in compliance with the authorizations, they should be readily available and easily accessible at the station's principal control point. All documents updating authorizations, such as Renewal Certificates, Call Sign changes, and changes in ownership should be associated with the corresponding station authorization. Collectively, these documents reflect the Terms of Station Authorization (TSA), and may include Special Temporary Authorizations, special conditions relating to measurements, tower signage, marking and lighting, interference, and other matters. [See [§73.1635](#), [§73.1670](#), [§73.3533](#), [§73.3536](#) and [§73.3539](#)]

RP	<i>It is recommended that all licensees post their broadcast licenses and other such authorizations at the main control point and at the transmitter site near or on the transmitter itself.</i>
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2. AUXILIARY ANTENNAS AND BACKUP FACILITIES

Stations sometimes maintain an Auxiliary Antenna in addition to the main licensed broadcast tower for use when the main antenna is damaged or must be taken offline for maintenance. Auxiliary Antennas that are permanently installed for ready use are required to be licensed. [See [§73.1675](#)]

- a) Does the station have an Auxiliary Antenna permanently installed and ready for use (connected or can readily be connected to a transmitter)?

Y P N/A

- b) Is this Auxiliary Antenna Licensed?

Y P N/A

- c) Does the Auxiliary Antenna installation match the parameters on the Auxiliary Antenna Authorization in detail?

Y P N/A

RP	<i>It is recommended that a copy of the Auxiliary Antenna Authorization(s) be kept at all locations where the Main Authorizations are located. Auxiliary Antenna Authorization(s) are identified as such in their title block.</i>
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RP	<i>Auxiliary Antennas [See §73.1675] are not to be confused with Emergency Antennas [See §73.1680]. An Auxiliary Antenna is one that is installed and configured in advance of its need. An Emergency Antenna is one that is installed after its need becomes apparent. An Emergency Antenna can be installed without prior FCC authorization to return the station to air, but as soon as the station resumes operation using the Emergency Antenna, the station must contact the FCC with the details of its current operation and may need to obtain a Special Temporary Authority (STA) authorization to continue use. If the Emergency Antenna remains in place after returning to the main antenna, it should then be licensed as an Auxiliary Antenna.</i>
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3. ANTENNA STRUCTURE REGISTRATIONS

Copies of all Antenna Structure Registrations (ASRs), whether issued to the licensee, station or another party, are to be readily available and should be kept with the Station Authorizations. (Details on ASRs are in SECTION II: ANTENNA STRUCTURES below.)

d) Are copies of all ASRs available?

N/A

4. BROADCAST AUXILIARY SERVICES (BAS)

Many AM stations utilize Broadcast Auxiliary Services (BAS) in the form of Studio-Transmitter Links (STL), Intercity Relays (ICR), Remote Pickup Units (RPU) and Transmitter-Studio Links (TSL). Under most circumstances, these must be licensed pursuant to [Part 74](#) of the FCC Rules and Regulations. Once licensed, these facilities are electronically linked to the main station license and are automatically renewed with the main station license. As a result, BAS facilities may continue to be licensed and linked to a station's main license even though they have been removed from service. BAS licenses that are no longer in use but still authorized and reflected in the FCC's ULS database should be cancelled. Cancellation requires action by the station. Additionally, many stations move studios and their associated STL facilities while neglecting to modify the associated BAS licenses. Such moved facilities are considered unauthorized by the FCC, require new or modified licenses, and can create frequency coordination conflicts. Each BAS license associated with the AM Station should be reviewed for correctness. A copy of the BAS licenses should be available and kept with the TSA. It is not necessary and probably not desirable for copies of these licenses to be placed in the PIF.

Each BAS license should be correct. Pay particular attention to:

- Frequency
- Coordinates
- Antenna Type
- Antenna Height
- Antenna Polarization
- Emissions Designator(s)
- Power Levels
- for Digital - Data Rates and Modulation Type

It should be noted that STL system transmitting equipment (Make and Model) can be changed without modification of the license provided that the replacement is type accepted (or the equivalent SDOC) and has the same a) Frequency, b) Emission Designator c) Digital Data Rates d) Digital Modulation Type, and d) Frequency Tolerance. This means that changing from analog equipment to modern digital equipment requires a modification of the BAS license. Changes in STL antennas generally require modification of the license unless the antennas are identical to those presently authorized.

e) Are copies of all BAS Licenses Available?

N/A

f) Are all licenses associated with the AM Station still being used? Licenses that have not been used for 1 year and that do not have a current plan for reuse should be cancelled.

N/A

g) Does each BAS License agree with the specifications of the installed system?

N/A

5. WIRELESS DEVICES

Wireless Devices like wireless microphones, interruptible foldback systems (IFB) and other such devices are generally required to be licensed under FCC Part 74 or other applicable parts.

h) Are the Station's Wireless Devices properly licensed?

Y P N/A

RP

Licenses for BAS or Wireless Devices that have not been used for 1 year and that do not have a current plan for reuse should be cancelled. [See [§74.532\(f\)](#)]

6. NON-BAS AUTHORIZATIONS

Many broadcast stations utilize FCC licensed facilities that are not coupled to the main station authorization. These include authorizations for satellite earth stations (Licensed under the FCC International Branch), Part 101 fixed microwave services (Managed in the ULS), and Part 90 Private Land Mobile Radio Services (Managed in the ULS). Copies of these authorizations should be kept with the main station authorization as part of the TSA. A record or tickler system should be maintained to remind the station of the pending renewal dates for these authorizations as these authorizations do not renew coincident with the stations' main authorization.

a) Does the station have any authorizations that are not handled as BAS and coupled with the station's main authorization?

Y N/A

i) Has the station established a tickler reminder system to assure that the renewal of these authorizations will not be overlooked?

Y N/A

B. STATION LOG/RECORDS

1. STATION LOG

The Station Log should include entries pertaining to equipment operation, equipment status, equipment calibration (as recommended within this document and other sources), the Emergency Alert System (EAS), any additional information required in the TSA, and tower light observations and outages, where applicable. Station Logs shall be retained for a period of two years, unless specified otherwise by the FCC.

2. STATION RECORDS

Station Records include but are not limited to the Public Inspection File (PIF), Chief Operator designations, all details of the design and maintenance of any directional antenna systems, SCA (subcarrier) lease agreements, required equipment performance measurements, and any other requirements listed in the TSA. Station Records should be maintained for as long as they are applicable or until they are updated.

3. STATION CONTRACTS

Certain contractual agreements must be provided within 7 days of a request by the FCC. These agreements are part of the Station Records.

4. STATION LOG AND STATION RECORDS REQUIREMENTS

The Station Log and Station Records are to be kept in an orderly and legible manner, in suitable form and with sufficient detail to document the items logged. The Station Log and Station Records may be kept in separate sections at diverse locations. Station Log and Station Records shall be readily available or remotely accessible for inspection or duplication as requested by the FCC or its representatives at the Station's Main Studio location (as listed in the PIF). The Log and Records should be well-organized with key letters or abbreviations clearly defined within the records, with

each Log page numbered and with dates and time for each log entry. Times entries are to be made in local time indicating current Time Zone reference (e.g., EST/EDT). [See [§73.1225](#), [§73.1226](#), [§73.1590](#), [§73.1800](#), [§73.1820](#) and [§73.1840](#)]

b) LOG RETENTION: Is the required Station Log retained for a period of two (2) years? [see [§73.1840](#) (a)]

Y P N/A

c) AVAILABILITY: Are Station Log and Station Records readily available for inspection and/or duplication at the request of the FCC or its representatives? [See [§73.1225](#) and [§73.1226](#)]

Y P N/A

Equipment Performance Measurements (also called “NRSC 1 Measurements” measurements) are required upon the initial installation of a new, replacement or modification of an existing transmitter. Additionally, Equipment Performance Measurements are required annually with not more than 14 months between measurements. These measurements should be retained in the Station Records and available for review. [See [§73.1590](#)]

d) EQUIPMENT PERFORMANCE MEASUREMENTS: Are the latest required Equipment Performance Measurements readily available? [See [§73.1590\(a\)](#)]

Y P N/A

e) CLARITY: Is the Station Log legible and in such detail that it clearly documents any problems that may have occurred at the station? [See [§73.1800](#) (b)]

Y P N/A

5. CHIEF OPERATOR

Each station must designate a Chief Operator. The designation is to be in writing with a copy posted with the station authorization. The chief operator for an AM station using a directional antenna or operating with greater than 10 kW authorized power is to be an employee of the station on duty for whatever number of hours each week the station licensee determines is necessary to keep the station's technical operation in compliance with FCC rules and the terms of the station authorization (TSA). Agreements with chief operators serving on a contract basis must be in writing with a copy kept in the Station Records. The Chief Operator is to review the Station Log at least once each week to determine if required entries are being made and correctly reflect the operation of the station. The Chief Operator is to sign and date the Station Log upon completion of the review. The Chief Operator is also responsible for oversight of the inspection and calibration of the transmission system, monitors, and metering and control systems in addition to any equipment performance measurements or other tests as specified in the rules or the TSA. [See [§73.1870](#)]

NOTE: An electronic signature is acceptable in lieu of a written signature for those making, or reviewing, entries in Station Log and Station Records that are maintained on digital media.

a) CHIEF OPERATOR DESIGNATION: Has the licensee designated a person to serve as the station Chief Operator? [See [§73.1870](#) (a) and (b)]

Y P N/A

b) EMPLOYEE: For stations that utilize a directional antenna or operate with greater power than 10 kW, is the Chief Operator an employee of the station? [See [§73.1870](#) (b)(1)]

Y P N/A

c) DESIGNATION POSTING: Is the designation in writing with a copy of the document posted or readily available? [See [§73.1870](#) (b)(3)]

Y P N/A

d) STATION LOG REVIEW: Does the station's Chief Operator review the Station Log at least once each week to determine if required entries are being made? [See [§73.1870](#) (c)(3)]

Y P N/A

e) SIGNING STATION LOG: Does the Chief Operator or a designee date and sign the Station Log upon completion of the weekly review of these documents? [See [§73.1870](#) (c)(3)]

Y P N/A

C. PROGRAMMING RELATED RULES

1. STATION IDENTIFICATION

Station Identification shall be made at the beginning and ending of each period of operation, and hourly, as close to the hour as feasible, at a natural break in programming. The identification shall consist of the station's call letters immediately followed by the community (or communities) of license as listed on the station license. Any reference to additional communities not specified in the station's license must be made after the community of license. The name of the licensee, or the station frequency, channel number, or both, may be inserted between the call letters and community of license. No other insertion is permissible. Simulcast stations may identify jointly if owned by the same licensee. [See [§73.1201](#)]

AM Stations that own translators or that have made agreements with other translator owners who rebroadcast the AM Station's programming may have Station Identification requirements for those translators. The translator's Station Identification is the call sign followed by the location listed on the translator's TSA. [See SBE FM Translator Guides for details]

a) IDENTIFICATION: Is the station identification made in accordance with [§73.1201](#)?

Y P N/A

a) TRANSLATOR IDENTIFICATION: Does the station have an obligation to do Station Identification for translators rebroadcasting its signal and are these Station Identifications being done correctly?

Y P N/A

RP

Each licensee of each station should ID all digital sub-channels in the following format: the Station ID should include a reference to the sub channel along with call letters and the community of license. An example of a Station ID for WXXX, New York City would be WXXX and WXXX HD2, New York City or WXXX 710 kHz and WXXX HD2, New York City.

2. BROADCAST OF TELEPHONE CALLS

Before recording an outgoing telephone conversation for broadcast, or broadcasting such a conversation simultaneously with its occurrence, a licensee shall inform any party to the call of the licensee's intention to broadcast the conversation, except where such party is aware, or may be presumed to be aware from the circumstances of the conversation, that it is being or likely will be broadcast. Such awareness is presumed to exist only when the other party to the call is associated with the station (such as employee or part-time reporter), or where the other party originates the call, and it is obvious that it is in connection with a program in which the station customarily broadcasts telephone conversations.

Incoming calls to the station may be aired provided they are received on numbers commonly used by the station for such incoming calls and these calls are routinely aired or recorded for airing such that the caller gives implied consent for airing or recording. [See [§73.1206](#)]

a) OUTGOING TELEPHONE CALLS: Has the licensee established a policy and does the licensee enforce the policy to protect all non-station persons from unknowingly being placed on the air or recorded for use on the air without their knowledge?

Y P N/A

RP	<p><i>While §73.1206 is directed specifically at telephone conversations, out of an abundance of caution it is recommended that the same protection should be afforded to all non-station persons utilizing all methods of communications including Social Media, instant messenger, Zoom and other modern technologies for communications which would normally be considered private in nature.</i></p> <p><i>This protection prevents news departments from utilizing telephone conversation (and possibly other) recordings of newsworthy events unless all participants to the conversation are aware that they are being broadcast or recorded for broadcast.</i></p>
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3. SPONSORSHIP ANNOUNCEMENTS

When a broadcast station transmits any matter for which money, service, or other valuable consideration is either directly or indirectly paid or promised to, or charged or accepted by such station, the station, at the time of the broadcast, shall announce at the time the matter is aired that such matter is sponsored, paid for, or furnished, either in whole or in part, and by whom or on whose behalf such consideration was supplied. [See [§73.1212](#) (a)]

Political broadcast matters or broadcast matters involving the discussion of a controversial issue have significant additional record keeping and publishing requirements addressed under the Public Inspection File portion of this document.

The licensee must exercise reasonable diligence to obtain from its employees and others involved with the matter all information that enables the licensee to make the appropriate sponsorship announcements. This is the basis of the FCC’s policy on Payola/Plugola. [See [§73.1212](#)(b), <https://www.fcc.gov/sites/default/files/payola-rules.pdf> and <https://transition.fcc.gov/eb/broadcast/sponsid.html>].

In the case of advertising of commercial products or services, an announcement stating the sponsor’s corporate or trade name, or the name of the sponsor’s product, when it is clear that the mention of the name of the product constitutes a sponsorship identification, shall be deemed sufficient for the sponsorship announcement. [See [§73.1212](#)(f)]

All broadcast advertising agreements must include a provision indicating that the station does not discriminate on the basis of race or ethnicity. The FCC’s license renewal application form (Form 303-S) requires a “Yes” or “No” answer to whether all of the station’s advertising agreements in the past license term contained such a provision, and a “No” answer requires an explanation of the extent to which the station violated this policy.

a) SPONSORSHIP ANNOUNCEMENTS: Has the licensee established and is the licensee enforcing the requirements that all required sponsorship announcements are being made?

Y P N/A

b) PAYOLA/PLUGOLA: Has the licensee established and is the licensee enforcing policies permitting the licensee to assure that all persons involved are aware of the sponsorship requirements and are providing the licensee with the required information and/or prohibiting the broadcasting of programming without the required sponsorship announcements?

Y P N/A

c) COMMERCIAL SPONSORSHIP: Has the licensee established and does the licensee monitor the policy to assure that all commercial advertising contains the sponsor's corporate or trade name, or the name of the sponsor's product? (Teaser spots as part of a promotional campaign are particularly problematic regarding sponsorship.)

Y P N/A

d) NON-DISCRIMINATION: Do all of the licensee's advertising contracts include a provision that the licensee does not discriminate on the basis of race or ethnicity?

Y P N/A

4. UNDERWRITING ACKNOWLEDGEMENTS (NCE STATIONS ONLY)

Non-Commercial Educational stations (NCE) are not permitted to air advertisements, which are announcements broadcast in exchange for any remuneration and intended to promote any service, facility, or product of for-profit entities. While contributors of funds to Non-Commercial Educational stations may receive on-air acknowledgements (commonly called "underwriting acknowledgements"), such acknowledgements may be made for identification purposes only, and should not promote the contributors' products, services, or businesses. Specifically, such announcements may not contain comparative or qualitative descriptions of products or services, price information, calls to action, or inducements to buy, sell, rent or lease those products or services.

d) UNDERWRITING ACKNOWLEDGEMENTS: Has the Non-Commercial Educational licensee established and is the licensee enforcing a policy to ensure that underwriting acknowledgements are limited to identification of the contributor and the products or services offered, and do not contain price information, qualitative descriptions of products or services, or a "call to action" or an inducement to buy, sell, rent or lease those products or services?

Y P N/A

5. RECORDED PROGRAMMING

Any recorded program in which time is of special significance, or by which an affirmative attempt is made to create the impression that it is occurring simultaneously with the broadcast, shall be announced at the beginning as recorded. The language of the announcement shall be clear and in terms commonly understood by the public. For television stations, the announcement may be made visually or aurally.

Recorded announcements which are of a commercial, promotional or public service nature need not be identified as recorded. [See [§73.1208](#)]

a) PRE-RECORDED ANNOUNCEMENTS: Has the licensee established and does the licensee enforce a policy of pre-announcing as recorded any program where time is significant or an attempt is being made to create the impression that the program is live?

Y P N/A

RP	<i>Pre-recorded programs that are accepting callers for audience interaction would be a case where the program is attempting to create the impression that it is live, and it is recommended that playback be appropriately interrupted each hour with an announcement stating that the program is pre-recorded. If possible, announcement of dial-in telephone numbers should be muted during subsequent broadcasts.</i>
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6. OBSCENITY, INDECENCY AND PROFANITY PREVENTION

The issues of obscenity, indecency and profanity and the FCC’s treatment of these are well defined. Obscenity may never be broadcast on the public airways, indecency may be broadcast during “Safe Harbor” hours, and profanity is permissible only in limited circumstances. The difficulty is that the definition of each is subjective, context driven and can vary over time. This is further complicated because FCC enforcement actions are complaint-driven, making the precedents less consistent.

Each licensee should establish policies and procedures for prohibiting or limiting obscene, indecent and profane programming and should enable the appropriate personnel with the authority to make quick decisions to enforce these policies as necessary. [See [§73.3999](#) and [18USC1464](#)]

RP	<i>It is recommended that when live programs are being produced where content can be provided by non-broadcast professionals (and possibly even when it is limited to broadcast professionals) that the program be run through a delay system with readily accessible to exclude offensive content (dump controls) to persons who are monitoring the program and have been given the authority to intercept potentially inappropriate content.</i>
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- a) OBSCENITY, INDECENCY and PROFANITY POLICY: Has the license established and does the licensee review and enforce a policy governing questionable content?

Y P N/A

7. EAS TONES

False or mistaken EAS tones have been an area of increased FCC enforcement in recent years. To avoid creating confusion, lessen the impact of the EAS transmitted tones from overuse (both the traditional EAS Two Tone attention signal and the FSK data header/EOM) and prevent false activation of EAS decoders, the FCC prohibits the transmission, recording or simulation of these tones on the air by any broadcast station unless in the connection with an actual National, State or Local Area emergency or an authorized test of the EAS system. Extreme care should be used in attempting to simulate a tone that is technically not part of the EAS system tones but can give the impression of being an EAS tone, as that can still be deemed a violation of the rules. Inadvertent rebroadcast of EAS tones in background audio should be avoided.

There is an exception to this restriction for Public Service Announcements (PSA) provided by federal, state, and local government entities, or non-governmental organizations, to raise public awareness about emergency alerting when presented in a non-misleading and technically harmless manner, including an explicit statement that the Attention Signal and EAS code simulation are being used in the context of a PSA for the purpose of educating the viewing or listening public about emergency alerting. However, stations should be extremely cautious even in these situations.

Further, should any inappropriate use of these tones occur, the FCC requires that the FCC be notified by e-mail (FCCOPS@fcc.gov) within 24 hours of the discovery of such misuse and requests that any Government Agency that becomes aware of a misuse also notify the FCC. [See [§11.45](#) and [§11.46](#)]

- a) PROHIBITED USE OF EAS TONES: Has the licensee established and does the licensee enforce policies and procedures to prevent the inappropriate use of EAS tones of any kind or of simulated tones that could give the impression of being an EAS tone, including but not limited to, live and recorded programming, commercials and other sponsored material, syndicated content, and content aired during time programmed by another entity, such as time-brokered or donated time?

Y P N/A

- b) EAS PROGRAMMING PERSONNEL TRAINING: Has the licensee trained all programming and production personnel of the proper use and the appropriate restrictions of the EAS? [See EAS Section in this Guide]

Y P N/A

8. BROADCAST OF FALSE INFORMATION

No licensee or permittee of any broadcast station shall broadcast false information (hoaxes) concerning a crime or catastrophe if the licensee knows this information is false, it is foreseeable that the broadcast of the information will cause substantial public harm, and broadcast of the information does in fact cause substantial public harm. Any programming accompanied by a proper disclaimer will be presumed not to pose foreseeable public harm. [See [§73.1217](#)]

- a) BROADCAST HOAX: Has the licensee established and does the licensee enforce policies to prevent the broadcast of a hoax that can cause public harm without the appropriate disclaimers?

Y P N/A

9. LICENSEE-CONDUCTED CONTESTS AND LOTTERY ADVERTISEMENTS

A licensee that broadcasts or advertises information about a contest it conducts shall fully and accurately disclose the material terms of the contest and shall conduct the contest substantially as announced or advertised over the air or on the Internet. No contest description shall be false, misleading or deceptive with respect to any material term. The material terms shall be made available to the public by periodic broadcast on the station or by written disclosure on the station's Web site.

As a matter of FCC policy (and general liability concerns), the licensee must exercise caution to ensure that no contest has the potential to harm the contest participants or the general public. [See [§73.1216](#)]

- a) LICENSEE-CONDUCTED CONTESTS: Has the licensee established and does the licensee enforce policies to assure that all contests have accurately disclosed material terms of the contest that are available to the public and each contest is run without varying from the material terms and does not pose potential harm to the participants or the public?

Y P N/A

Significant restrictions are placed on the advertisement or information broadcast of any lottery, gift enterprise, or similar scheme offering prizes dependent in whole or in part upon lot or chance, or any list of the prizes drawn or awarded by means of any such lottery, give enterprise or scheme. [See [§73.1211](#)]

- b) BROADCAST LOTTERY: Has the licensee established and does the licensee enforce its policies to assure compliance with [§73.1211](#).

Y P N/A

D. PUBLIC INSPECTION FILE

All stations, including applicants for a broadcast station, shall maintain a Public Inspection File (PIF).

All operating broadcast stations' Public Inspection Files shall be maintained online at a website hosted by the FCC. Although the FCC has committed to automatically importing certain documents to stations' online Public Inspection File (PIF), it is the licensee's responsibility to make sure that all necessary documents are maintained and up-to-date, including any material that the FCC does not automatically upload, such as the Annual EEO Public Report and the Quarterly Issues/Programs Lists, for which the FCC often fines stations for failure to upload in a timely manner. It also important to note a failure to upload required information in a timely manner can lead to additional fines for a failure to self-assess compliance with a rule and for falsely certifying compliance with a rule in a station's license renewal application. Stations need to make sure that they place and review information in their PIF on a regular basis in accordance with [§73.3526](#) for commercial stations or [§73.3527](#) for Non-Commercial Educational stations.

Stations that maintain a publicly accessible website must conspicuously display a link to the station's PIF on the website homepage, along with contact information for a station representative that can assist any person with disabilities with issues related to the content of the station's PIF. Additionally, links to a list of certain current FCC Applications while pending, the latest Broadcast Equal Employment Opportunity Model Program Report (formerly FCC Form 396-A), if required, and the Station Contest Rules, as applicable, should also be placed on the home page of the stations' website. [See [§73.3526](#) for commercial stations, [§73.3527](#) for Non-Commercial Educational stations, and [§73.3580](#), [§73.1216](#), and [§73.2080](#)]

RP	<i>It is recommended that stations be able to provide the public with a one-sheet handout describing how to access the PIF for that station.</i>
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RP	<i>The FCC states that it should automatically upload the authorizations, filed applications, filed ownership reports, filed EEO documents, contour maps, and "The Public and Broadcasting Manual," but it is the Licensee's ultimate responsibility to assure that these items are all correctly in place. If these materials are not in place, it is suggested that the Licensee contact the PIF Help Desk for assistance, and to consider manually uploading the missing documents to the appropriate Additional Documents folder. Periodic confirmation that all documents can be retrieved from the public facing (not the administrative page) PIF is recommended. The public facing PIF must be accessible from a link on the homepage of the station's web site.</i>
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RP	<i>Licensees should remove older materials from the PIF once they have reached the end of their respective retention periods as specified in the Rules and Regulations and on the PIF administration page. [See §73.3526(e)(1) or §73.3527(e)(1)]</i> <i>It is recommended that the links be verified and that the authorizations referenced by these links also be placed in the Station's Information / Additional Documents Tab in the PIF.</i>
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RP	<i>It is recommended that the Licensee maintain a journal in their internal files of all errors and non-timely uploads to the PIF to assist in preparing the next license renewal application, which may require disclosure of any missing or late-filed information required in the PIF.</i>
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1. PUBLIC INSPECTION FILE AND STATION WEBSITE

- a) FILE MAINTAINED: Does the station maintain a separate Public Inspection File online at the FCC PIF Site for each station authorized? [§73.3526(a & b) or §73.3527(a & b)]

Y P N/A

- b) FILE REVIEW and CLEANUP: Does the station periodically review its PIF to assure completeness and remove outdated information?

Y P N/A

- c) WEBSITE LINK: If the station has a web page, are there valid links to the PIF and links to someone who could assist the public with the PIF conspicuously displayed on the home page?

Y P N/A

Note: Each of the following sections corresponds to a tab in the PIF.

RP	<i>Stations should schedule a thorough review of its PIF at least twice a year.</i>
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2. STATION INFORMATION

The (TV)(AM)(FM) Station Information Section contains general information, some provided by the FCC and some by the station, about the specific station. Copies of the License Authorization and its renewal, general contact information to the station and its Main Studio address are provided in this section. A link to The Public and Broadcasting Manual is placed by the FCC in this section. Stations should review this section periodically to ensure all links work and all information is correct. Some information may be corrected by the station, some will require the station to contact the PIF Help Desk for correction.

- a) STATION AUTHORIZATION: Is a copy of the current primary FCC authorization to operate the station, and its renewal being maintained in the file?

Y P N/A

RP	<i>The View License Authorization link on the PIF/Station Information Section often fails to display on the web page. It is recommended that a copy of the station's current primary station license be uploaded to the PIF/Station Information/Additional Documents folder.</i>
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- b) "THE PUBLIC AND BROADCASTING": Does the link on the PIF/Station Information "The Public and Broadcasting Manual" access the latest version of the document "The Public and Broadcasting Manual"? [See [§73.4210](#), [§73.3526\(e\)\(8\)](#) or [§73.3527\(e\)\(7\)](#)]

Y P N/A

RP	<i>The FCC maintains a hyperlinked copy of "The Public and Broadcasting" in the station's PIF. It is recommended that all station personnel read this document and the licensee should be aware of its obligations to the public with respect to broadcasting.</i>
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- c) ADDITIONAL INFORMATION: Are the Licensee, Licensee's Address, Main Studio Address, Contact Email address, Station Website (if it exists), Station Logo, Station Contact Personnel Information, and any other information present, correct and links confirmed to be working?

N/A

RP	<i>The FCC maintains a hyperlinked copy of "The Public and Broadcasting" in the station's PIF. It is recommended that all station management personnel read this document and the station should be aware of their obligations to the public with respect to broadcasting. We also recommend that the all links be checked.</i>
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3. APPLICATIONS AND RELATED MATERIALS

- a) APPLICATIONS: Does the public file contain copies of all applications, exhibits, letters, initial and final decisions in hearing cases, and other documents pertaining to the station which were filed with the FCC, and which are open for public inspection at the FCC? This includes applications granted pursuant to a waiver. [See [§73.3526\(e\)](#) or [§73.3527\(e\)](#)]

N/A

- b) RETENTION: Applications must be retained in the file until final action is taken on the application, except those applications for construction permits, assignments, or transfers granted pursuant to a waiver must be retained for as long as the waiver is in effect. Have 'Final Grant' applications been marked "OUT" or removed from the PIF?

N/A

NOTE: If a Petition to Deny is filed against an application and served on the applicant, a statement that the Petition was filed must be maintained in the PIF together with the name and address of the party who filed the Petition.

4. OWNERSHIP REPORTS

- a) OWNERSHIP REPORTS: For station licensees and any entities that hold an attributable interest in the licensee (such as parent companies), does the public file contain copies of the most recent, complete ownership reports and supplemental ownership reports filed with the FCC, including all exhibits, letters, and other documents associated with these filings? [See [§73.3526\(e\)\(5\)](#), [§73.3527\(e\)\(4\)](#) and [§73.3615](#)]

N/A

- b) RETENTION OF OWNERSHIP REPORTS: Are the ownership reports retained until a new, complete ownership report is filed with the FCC with a copy placed in the public inspection file? Have the outdated reports been marked "OUT" or removed from the PIF? [See [§73.3526\(e\)\(5\)](#) or [§73.3527\(e\)\(4\)](#)]

N/A

- c) OWNERSHIP INFORMATION: For Non-Commercial Educational stations, does the ownership information on file with the FCC reflect the current ownership (board members, officers, etc.) of this station? [See [§73.3527\(e\)\(4\)](#) and [§73.3615\(d, e & f\)](#)]

N/A

- d) CONTRACTS: For all stations, does the public file contain either a copy of the contracts listed in the latest ownership reports or an up-to-date list of such contracts for as long as they are in effect? [See [§73.3526\(e\)\(5\)](#), [§73.3613](#), and [§73.3526\(e\)\(14\)](#) and (16)]

N/A

5. EQUAL EMPLOYMENT OPPORTUNITY (EEO) RECORDS

Annually, on the anniversary of the date a station is due to file its renewal application, the station shall place an EEO public file report containing the information specified in the FCC Rules. [See [§73.2080\(6\)](#)]

- a) ANNUAL EEO REPORTS: Does the station file have a copy of each annual EEO report filed since the last station license renewal? [See [§73.2080](#) and either [§73.3526\(e\)\(7\)](#) or [§73.3527\(e\)\(6\)](#)]

Y P N/A

- b) RETENTION OF EEO REPORTS: Are these reports retained until the grant of the station's next renewal application has become final? [See [§73.2080](#) (c)(5) and either [§73.3526\(e\)\(7\)](#) or [§73.3527\(e\)\(6\)](#)]

Y P N/A

6. CONTOUR MAPS

- a) The FCC places a contour map in the PIF based on the last granted authorization. Does the contour map appear to be correct with respect to the station's underlying Construction Permit? [See [§73.3526\(e\)\(4\)](#) or [§73.3527\(e\)\(3\)](#)]

Y P N/A

RP	<i>The FCC automatically generates and adds the Coverage Maps to each station's PIF; however, the FCC-generated map does not always load correctly and thus stations should periodically confirm the map available in the PIF is correct and contact the PIF Help Desk if there are difficulties.</i>
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7. POLITICAL FILE

The Licensee must upload and maintain information about all requests for broadcast time either: made by or on behalf of candidates for public office; or concerning a legally qualified candidate, any election to federal office, or a national legislative issue of public importance; or concerning a controversial issue of state or local public importance. The Licensee must provide information about handling these requests, disclose the terms of handling this request and post documentation confirming the airing of these requests. The Licensee should ensure that each record is complete within the meaning of the FCC's rules as the required information varies depending on the particular type of political advertising material at issue. This information is to be uploaded immediately absent unusual circumstances.

Stations should consult with their own attorney on establishing a procedure for ensuring the timely upload of information related to requests for political advertising time.

Should the online Public Inspection File become unavailable to the public (for example, due to failure of the FCC's website or a government shutdown), the FCC has made clear that the broadcaster is obligated to ensure the public can continue to access the station's Political File by either making it available online via the station's website, or by making it available in paper or electronic form at an "accessible location" in the station's community of license during normal business hours. An accessible location would include a station office, the local library, the office of an accountant, or any other business. Licensees should maintain an updated back-up copy of their Political File in whatever form is most convenient and readily available in the event the PIF is unavailable.

- a) POLITICAL FILE: Does the licensee have a procedure for ensuring the timely upload of all requests, and has the timely upload of all requests, timely upload of all dispositions of the requests, and the timely upload of the reconciliation information of all political requests been completed?

Y P N/A

RP	<i>The FCC states that this information shall be uploaded “immediately absent unusual circumstances.” FCC staff have taken the position that “immediately” means within one business day. It is generally recommended that stations should upload required political file records before the end of the business day on which the record was created. “Reconciliation information” such as invoices after a political advertising schedule have aired, need not be uploaded “immediately,” but instead may be uploaded when the station typically generates such reconciliation information in the ordinary course of business operations. Station personnel should be available to answer questions about final reconciliation in person, via email, or over the phone.</i>
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RP	<i>Political Files and Political and Controversial Issues are among the most involved and important parts of the PIF. They are covered in three sections of the PIF; the “Political File” covered by §73.1943 and which a backup is to be locally maintained in the event of a failure of the OPIF, the “Political Matters and Controversial Issues Disclosures” covered by §73.1212(e) and the “Foreign Government-Provided Programming Disclosures” covered by §73.1212(j). Communications Law firms and the NAB may prepare primers and provide webinars covering these issues before the beginning of each political season. It is recommended that all persons involved with tracking Political Files and Political and Controversial activities review the current primer or take advantage of the offered webinar before each season as a refresher and to cover rules that might have changed.</i>
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RP	<i>The FCC requires that a local, backup copy of the political file be maintained in the event that the online file cannot be reached or becomes corrupted. Although not required, stations may wish to retain a local, backup copy of the entire Public Inspection File. The local, backup copy may be useful in restoring a corrupted online file.</i>
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b) FREE POLITICAL TIME: If free time was provided for use by or on behalf of a legally qualified candidate for federal, state, or local office, has a complete record of the free time that was provided been placed into the PIF? [See [§73.1943](#) and either [§73.3526](#) (e)(6) or [§73.3527](#) (e)(5)]

Y P N/A

c) RETENTION OF POLITICAL RECORDS: Is the Political File being retained for a period of two years as required? [See [§73.3526\(e\)\(6\)](#) or [§73.3527\(e\)\(5\)](#)].

Y P N/A

RP	<i>Stations may also want to retain these records for longer than two years in an internal file, in the event a contract dispute arises concerning a specific political ad buy.</i>
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7. CITIZEN AGREEMENTS

For commercial stations, are copies of any written agreements with local listeners (Citizen Agreements) maintained in the file for the term of the agreement? In this context, a citizen agreement is between a licensee and one or more citizen groups, entered for primarily noncommercial purposes. For example, an agreement entered into with a citizen group with the goal of directly affecting station operations in the areas of programming and employment would be a citizen agreement. [See [§73.4060\(75\)](#), [§73.4060\(78\)](#), and [§73.3526\(e\)\(3\)\(ii\)](#),

a) CITIZEN AGREEMENTS: If appropriate, are copies of all Citizen Agreements in the OPIF?

N/A

b) RETENTION OF CITIZEN AGREEMENTS: Are these records retained for as long as they are in effect? [See [§73.3526\(e\)\(3\)\(i\)](#) or [§73.3527\(e\)\(5\)](#)]

N/A

9. DONOR LISTS - FOR NCE STATIONS ONLY

a) For Non-Commercial Educational stations, does the licensee maintain a list of donors (underwriters) supporting specific programs? See [§73.3527\(e\)\(9\)](#)

N/A

NOTE: A station must update its donor list at the time of the broadcast of the specific program(s) supported.

b) RETENTION OF DONOR LISTS: For Non-Commercial Educational stations, does the licensee retain such donor list(s) for a period of two years? [See [§73.3527\(e\)\(9\)](#)]

N/A

10. FCC INVESTIGATIONS OR COMPLAINTS

a) Does the station have any material having substantial bearing on matters which are the subject of FCC investigations or complaints to the FCC of which the licensee has been advised? [See [§73.3526\(e\)\(10\)](#) or [§73.3527\(11\)](#)]

N/A

b) RETENTION OF INVESTIGATIVE MATERIAL: Has this material been retained until the licensee is notified in writing by the FCC that the material may be discarded? [See [§73.3526\(e\)\(10\)](#) or [§73.3527\(e\)\(11\)](#)]

N/A

11. FOREIGN GOVERNMENT PROVIDED PROGRAMMING DISCLOSURES

A broadcaster that leases airtime to *any* entity must conduct the following diligence steps to determine whether the lessee is a foreign governmental entity (*i.e.*, a foreign government, foreign political party, agent of a foreign principal or U.S.-based foreign media outlet). [See [§73.1212\(j\)](#)]

- (i) inform the lessee of the foreign sponsorship disclosure requirement;
- (ii) inquire of the lessee whether the lessee qualifies as a foreign governmental entity;
- (iii) inquire of the lessee whether the lessee knows if anyone involved in the production or distribution of the programming that will be aired pursuant to the lease agreement, or a sub-lease, qualifies as a foreign governmental entity and has provided some type of inducement to air the programming; and
- (iv) memorialize the above three steps and retain such documentation in the licensee's records for either the remainder of the then-current license term or one year, whichever is longer, so as to respond to any future FCC inquiry.

During periods of the station's airtime being leased (LMA/TBA or other lease agreement), the licensee has obligation to disclose to the audience the source of any program provided in any part, directly or indirectly, by a foreign governmental entity:

- The required disclosure is as follows:
“The [following/preceding] programming was [sponsored, paid for, or furnished], either in whole or in part, by [name of foreign governmental entity] on behalf of [name of foreign country].”
- If the material broadcast contains a “conspicuous statement” pursuant to the Foreign Agents Registration Act of 1938, that statement will suffice if it identifies the foreign country associated with the individual/entity that has sponsored, paid for, or furnished the material being broadcast.

When such disclosure is required, it must also be documented in the PIF. [See [§73.1212 \(j\)\(7\)](#)] The information required to be placed in PIF is:

- a copy of the disclosure text reduced to writing,
- the name of the program and
- the date and time of each airing of the program.

This information is to be placed in the PIF quarterly by the 10th day following the end of each calendar quarter. [See [§73.1212 \(j\)\(7\)](#)]

- FOREIGN SPONSORSHIP ID DILIGENCE: Has the licensee conducted the diligence steps required by Section 73.1212(j)(3) of the FCC’s rules with respect to every lessee of air time and memorialized that diligence?
- FOREIGN SPONSORSHIP ID DISCLOSURE: Has documentation demonstrating disclosure during leased periods of foreign government programming been timely placed in the PIF? [See [§73.3526 \(19\)](#)]
- a) FOREIGN PROGRAM DISCLOSURE: Has documentation demonstrating disclosure during leased periods of foreign government programming been timely placed in the PIF? [See [§73.3526 \(e\) \(19\)](#)]

Y P N/A

- b) LICENSEE REASONABLE DILIGENCE: During leased periods, has the licensee in concert with its LMA/TBA/lessee partner performed reasonable diligence as described above to assure that foreign provided programs have been identified?

Y P N/A

11. INFORMATION ON THIRD-PARTY FUNDRAISING - FOR NCE STATIONS ONLY

For noncommercial educational AM broadcast stations that interrupt regular programming to conduct fundraising activities on behalf of a third-party non-profit organization similar to [§73.503 \(e\)](#) (FM stations) or [§73.621\(f\)](#) (television stations), every three months, the following information must be recorded for each third-party fundraising program or activity: The date, time, and duration of the fundraiser; the type of fundraising activity; the name of the non-profit organization benefitted by the fundraiser; a brief description of the specific cause or project, if any, supported by the fundraiser; and, to the extent that the station participated in tallying or receiving any funds for the non-profit group, an approximation of the total funds raised. The information for each calendar quarter is to be filed by the tenth day of the succeeding calendar quarter (April 10th for January-March, July 10th for April-June, October 10th for July-September, January 10th for October-December).

- a) REPORTS PLACED: Has the required information regarding Third-Party Fundraising been timely filed in the PIF? [See [§73.3527\(e\)\(14\)](#)]

Y P N/A

- b) RETENTION PERIOD: This material should be retained for the current licensed period. Has outdated material been removed from the PIF?

Y P N/A

12. ISSUES-PROGRAMS LISTS

- a) ISSUES AND PROGRAMS LISTS: Has the licensee maintained a list of programs that have provided the station's most significant treatment of community issues during the preceding calendar quarter? [See [§73.3526\(e\)\(12\)](#) or [§73.3527\(e\)\(8\)](#)]

N/A

- b) FILED QUARTERLY: Has the licensee uploaded the quarterly issues-programs lists in a timely manner? Missing or late-filed issues-programming lists are a common rules violation leading to monetary forfeitures. Typically, issues-programs lists are due to be filed by the tenth day of the succeeding calendar quarter (e.g., January 10, April 10, July 10, & October 10); however, in the event that the deadline falls on a weekend or federal holiday, the deadline is extended to the next business day. [See [§73.3526\(e\)\(12\)](#) or [§73.3527\(e\)\(8\)](#); [§1.4\(j\)](#)]

N/A

- c) NARRATIVES: Do the issues-programs lists include a brief narrative describing what issues were given significant treatment and the programming that provided this treatment? [See [§73.3526\(e\)\(12\)](#) or [§73.3527\(e\)\(8\)](#)]

N/A

- d) DESCRIPTIONS: Does the description of the programs include at a minimum the time, date, duration and title of each program in which the issue was treated? [See [§73.3526\(e\)\(12\)](#) or [§73.3527\(e\)\(8\)](#)]

N/A

- e) RETENTION OF ISSUES-PROGRAMS LISTS: Are the issues-programs lists retained until the next grant of the station renewal application has become final? [See [§73.3526\(e\)\(12\)](#) or [§73.3527\(e\)\(8\)](#)]

N/A

13. JOINT SALES AGREEMENTS

- a) JSA: For commercial stations, does the public file contain a copy of every agreement involving the joint sale of advertising time involving this station? Confidential or proprietary information may be redacted. [See [§73.3526\(e\)\(16\)](#)]. See Section VI for details.

N/A

- b) RETENTION OF JOINT SALES AGREEMENTS: Are these records maintained as long as the contract or agreement is in force? [See [§73.3526\(e\)\(16\)](#)]

N/A

14. LOCAL PUBLIC NOTICE ANNOUNCEMENTS CERTIFICATION

- a) LOCAL PUBLIC NOTICE: For FCC application filings requiring local public notice via on-air announcements (such as license renewal applications), was a statement certifying compliance with the local public notice filing announcements placed into the file within 7 days of the last day of broadcast of such announcements? [See [§73.3526\(e\)\(13\)](#), [§73.3527\(e\)\(10\)](#), [73.3580\(c\)](#), and [§73.3580\(e\)\(2\)](#)]

N/A

- b) RETENTION OF LOCAL PUBLIC NOTICE ANNOUNCEMENTS CERTIFICATION: Was the statement certifying compliance with [§73.3580\(e\)\(2\)](#) retained for as long as the application to which it refers and then removed? [See [§73.3526\(e\)\(13\)](#) or [§73.3527\(e\)\(10\)](#)]

Y P N/A

15. POLITICAL MATTERS AND CONTROVERSIAL ISSUES

Where the material broadcast is political matter or matter involving the discussion of a controversial issue of public importance and a corporation, committee, association or other unincorporated group, or other entity is paying for or furnishing the broadcast matter, the station shall, in addition to making the announcement required by this section, require that a list of the chief executive officers or members of the executive committee or of the board of directors of the corporation, committee, association or other unincorporated group, or other entity shall be made available for public inspection at the location specified under [§73.3526](#). If the broadcast is originated by a network, the list may, instead, be retained at the headquarters office of the network or at the location where the originating station maintains its public inspection file under [§73.3526](#). Such lists shall be kept and made available for a period of two years.” [See [§73.1212\(e\)](#)]

- a) POSTED: Have Political Matters and Controversial Issues lists been posted as required?

Y P N/A

- b) RETENTION: Have Political Matters and Controversial Issues lists been retained for two years?

Y P N/A

16. TIME BROKERAGE AGREEMENTS

- a) TIME BROKERAGE AGREEMENTS: For commercial stations, does the public file contain a copy of every agreement or contract involving time brokerage of the licensee’s station, or of another station by the licensee? Confidential or proprietary information may be redacted, but the redaction must be visible. [See [§73.4267](#), [§73.3526\(e\)\(14\)](#) and Section VI of this Guide]

Y P N/A

NOTE: Additional information regarding general definitions for time brokerage agreements (TBAs), joint sales agreements (JSAs), and local marketing agreements (LMAs) are addressed later in this Guide in Section VI.

- b) RETENTION OF TIME BROKERAGE AGREEMENTS: Are these records maintained for as long as the contract or agreement is in force? [See [§73.3526\(e\)\(14\)](#)]

Y P N/A

E. MAIN STUDIO

The FCC eliminated the Main Studio Rule in 2017. Nonetheless, stations are still licensed to specified communities within the United States or its territories and must serve those Communities of License, including through programming responsive to issues those communities are facing and by providing local contact information in those communities. At a minimum, each station is to maintain and publish a local telephone number in its Community of License or maintain a toll-free number.

The licensee of a broadcast station shall make the station available for inspection by representatives of the FCC during the station's business hours, or at any time the station is in operation. The address of the Main Studio in the PIF and the FCC records are the starting places for the FCC for such inspections and should be correctly maintained. [See [§73.1125](#), [§73.1225](#)]

1. COMMUNITY ACCESS

a) LOCAL ACCESS FROM COMMUNITY OF LICENSE: Does the station have and publish (at a minimum published in its PIF, the station web site, directory assistance and other such locations) a phone number that is a local or toll-free telephone number to contact station staff from the Community(ies) of License specified in the TSA?

Y P N/A

b) Has the licensee disclosed the Main Studio location in the PIF and in the LMS?

Y P N/A

SECTION II: ANTENNA STRUCTURES

A. ANTENNA REGISTRATION

Generally, antenna structures that are higher than 60.96 meters (200 feet) above ground level or that may interfere with the flight path of a nearby airport or could represent an obstruction to an aircraft, must be studied by the Federal Aviation Administration (FAA) and registered with the FCC. Owners are required to register their tower structures as required in Part 17. All proposed and altered antenna structures must be registered prior to construction or alteration. For licensees this means that the tower must be registered before a new construction permit or license modification involving the tower or antenna is granted. [See [§17.4](#), [§17.5](#) and [§17.7](#)]

Licensees who also own an antenna structure should be familiar with the FAA's marking (painting) and lighting specifications, including those shown on their Antenna Structure Registration (ASR). In the event that the structure owner is unable to maintain the prescribed marking and lighting, e.g., in cases including but not limited to abandonment, negligence, or bankruptcy, the FCC may require that each tenant-licensee and/or permittee on the structure to undertake efforts to maintain compliant marking and/or lighting. Additionally, if the licensee knows or has reason to believe that the structure is not in compliance or that the owner is not carrying out its responsibility to maintain the structure, FCC rules require the licensee to immediately notify the owner, notify the site management company (if applicable), notify the FCC, and make a diligent effort to ensure that the antenna structure is brought into compliance. [See [§17.6](#) and [§73.1213](#)]

Once an antenna structure is registered, the Antenna Structure Registration Number (ASRN) is to be displayed in a conspicuous place that is readily visible and legible to the public near the base of the antenna structure. When access to the property containing the antenna structure is restricted to the public, the number should also be placed on the gate(s) or fence leading to the antenna structure where the public can see it. Materials used to display the registration number must be weather-resistant and of sufficient size to be easily seen. [See [§17.4](#)]

More information about Antenna Structure Registration may currently be found at [FCC ASR](#)

ANTENNA STRUCTURE REGISTRATION

- a) REGISTRATION: Has the owner of the antenna structure on which the station antenna is mounted obtained an Antenna Structure Registration for the structure? [See [§17.4](#) (a)]

N/A

- b) POSTING OF NUMBER: Has the ASRN been posted so that it is visible and legible from the nearest publicly accessible area? [See [§17.4](#) (g)]

N/A

RP

It is recommended that in the postings referenced above, the owner and management of the tower list their detailed contact information.

B. ANTENNA AND STRUCTURE SPECIFICATIONS

The Antenna Structure Registration (ASR) (if applicable), construction permit, station license, or other instrument of authorization provide authority for the station to operate under a specific set of operating parameters. The licensee must thoroughly review the TSA, and where applicable the ASR, to verify that all specifications and other details (especially current marking, lighting, Ownership and Location) match the installed facilities.

1. ASR COMPLIANCE

a) OVERALL HEIGHT: Does the overall height of the structure (AGL and AMSL) match that specified in the TSA and, where applicable, ASR? [See TSA and ASR if applicable]

Y P N/A

b) ANTENNA: Do the number of bays, antenna type, and height of the radiation center (RCAGL) match that specified in the TSA? [See TSA]

Y P N/A

c) LOCATION: Do the geographical coordinates of the tower location and its address match the information shown on the TSA and, where applicable, the ASR? [See TSA and ASR]

Y P N/A

RP	<p><i>The FCC Rules & Regulations for broadcast stations are silent on the tolerance for the licensed coordinates, and the height of the tower and the antenna. For geographic coordinates, FAA Form 7460-1 specifies rounding to the nearest second. For antenna height, most FCC applications allow for a resolution of one-tenth meter while the FAA application states height should be to the nearest foot. The station's broadcast license should accurately reflect these parameters when rounded as may be appropriate.</i></p>
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C. TOWER LIGHT OBSERVATIONS

The lighting on tower structures is to be observed at least once every 24 hours either visually or by observing an automatic indicating device; or alternatively the licensee/tower owner may provide and maintain an automatic alarm system to constantly monitor the lighting on a structure. All automatic or mechanical control devices, indicators, and alarm systems are required to be inspected at intervals not to exceed 3 months. [See [§17.47](#)] Any extinguishment or improper functioning must be recorded in the Station Log. [See 73.1820(a)(1)]

RP	<p><i>It is recommended that the quarterly inspection of the tower lighting alarm system include creating a fault in the lighting system and confirming that all communications systems needed to notify appropriate personnel of a fault are functional. The results of the quarterly testing should be recorded in the Station Log.</i></p> <p><i>For purposes of future reference, the licensee should retain in its private business files a copy of all applications filed with the FAA and/or the FCC on tower issues.</i></p>
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1. MONITORING COMPLIANCE

a) OBSERVATIONS: Is the lighting on the tower(s) observed at least once every 24 hours, either visually or by observing an automatic indicating device; or, alternatively, has the licensee/tower owner provided and maintained an automatic alarm system? [See [§17.47](#)]

Y P N/A

b) MAINTENANCE CHECKS: Have all automatic and/or mechanical control devices, indicators, and alarm systems associated with the antenna structure lighting been inspected within the last 3 months? [See [§17.47](#)]

Y P N/A

D. MARKING/LIGHTING

The Antenna Structure Registration (ASR) specifies the marking (painting) and lighting requirements for each registered tower. This is shown as a set of numbers or letters which correspond to documents specified on the ASR.

The structure owner must make certain that the number and placement of paint bands and the number, type and placement of the lighting match that shown on the ASR. If required in the ASR, the licensee/tower owner should also be aware of the requirement to clean or repaint tower structures as often as necessary to maintain good visibility to aircraft. The appropriate paint colors are defined in the FAA Advisory Circular and a tolerance chart is available for the Aviation Orange Color. Paint is also an important consideration to protect the tower from corrosion. [See [§17.50](#)]

The Federal Aviation Administration issues Advisory Circulars defining tower marking and lighting, which have changed over the years. The tower marking and tower lighting must comply with the chapters listed in the version of the [FAA Advisory Circular](#) listed on the tower's ASR. Older towers may have marking and tower lighting specifications previously established by the FCC on form [FCC 715/715A](#) and [§17.53](#). Marking and lighting for these towers must comply with the FCC's specification. Copies of the appropriate FAA Advisory Circulars and the [FCC 715/715A](#) documents can be found online.

RP	<i>A common problem on towers that have marking requirements is the black-colored feedlines on the outside legs of the tower obscure the tower structure and defeat the purpose of the painting. The licensee/tower owner should make certain that the feedlines are painted to match the tower when they are installed or when the tower is repainted or are routed such that they do not obscure the tower paint. This applies only to towers that have marking requirements per their ASR.</i>
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1. MARKING AND LIGHTING COMPLIANCE

- a) MARKING SPECIFICATIONS: Does the marking on the antenna structure match the specifications shown on the ASR? [See ASR]

Y P N/A

- b) MARKING COLOR SPECIFICATIONS: Does the Aviation Orange Color, if applicable, match the "In Service Aviation Orange Color Tolerance Chart" and is checked annually? [See [Color Chart Vendor](#)]

Y P N/A

- c) MARKING BANDS: Does the structure have the correct number of bands and are the top and bottom bands painted aviation surface orange? [See ASR, [FAA Advisory Circular](#) or [FCC 715/715A](#)]

Y P N/A

- d) LIGHTING SPECIFICATIONS: Does the lighting on the antenna structure match the specifications listed on the ASR? [See ASR and [FAA 70/7460-1 \[Version\]](#) or [FCC 715/715A](#) as specified on the ASR]

Y P N/A

E. FAA NOTIFICATIONS

Within 30 minutes of the observation of an improperly functioning or extinguished top steady burning light or any flashing obstruction beacon regardless of its position on the structure, the tower owner/licensee must notify the Federal Aviation Administration (FAA) at (Phone: 877-487-6867 or in

Alaska, 800-478-3576) or via other appropriate means sufficient for the FAA to issue a Notice to Air Missions (NOTAM). Improper functioning includes failed (unlit) beacons as well as those that are not flashing or flashing at an incorrect rate when they are required to be flashing. Notification is also to be made immediately to the FAA once the beacon or steady burning top light is returned to service. Notification is not required when steady burning side light marker outages are observed but such outages should be corrected as soon as possible. Antenna structure owners/licensee should ensure that the telephone number for the FAA is readily available and known to all personnel who may be responsible for notifying the FAA of such outages. [See [§17.48](#)]

1. NOTAM

- a) FAA NOTIFICATION: Are the tower owner/licensee and all station operators aware of the requirement to notify the FAA within 30 minutes of the observation of an outage AND to notify the FAA again once the outage is corrected? [See [§17.48](#)]

N/A

RP	<i>It is recommended that the tower Owner/Licensee generate and post procedures with contact information to implement and manage the FAA notification process.</i>
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F. STATION LOG - TOWER LIGHT SECTION

For all stations operating from a tower owned by the licensee and have an ASR that specifies tower lighting, the licensee/tower owner is to make entries in the Station Log concerning ANY observed or otherwise known extinguishment or improper functioning of ANY tower light regardless of its position on the tower. [See [§17.49](#), [§73.1213](#) and [§73.1820](#) (a)(1)(i)]

This log must contain the following:

- The nature of such extinguishment or improper functioning.
- The date and time the extinguishment or improper operation was observed or otherwise noted.
- Date and time of FAA notification (if applicable),
- The date, time and nature of adjustments, repairs or replacements made. (This should include any work conducted as part of a system inspection or preventive maintenance program.)

Licensees should also log the date and time of quarterly inspections of lighting systems as described in [§17.47\(b\)](#).

Any extinguishment or improper functioning of a required tower light, regardless of its position on the tower, is to be corrected as soon as possible. (See [§17.48](#) and the terms of the ASR(s) .) A structure is not in compliance with the ASR(s) if any of the required light(s) are not functioning properly.

RP	<i>If an FAA notification is required, it is recommended that the log notation include the NOTAM number, the duration of the NOTAM and the initials of the person at the FAA receiving the outage report by phone, or a copy of the NOTAM information if filed online. The log should also include the full name of the person or persons making such entries.</i>
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RP	<i>Violations may be avoided by prompt and complete logging of the outage and by documenting that the efforts made to correct the condition are being done in a timely manner and assuring NOTAM procedures are followed.</i>
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1. LOG COMPLIANCE

- a) STATION LOG: Does the licensee/tower owner maintain a Station Log containing entries concerning ANY observed or otherwise known extinguishment or improper functioning of ANY tower light? [See [§17.49](#), [§73.1213](#) and [§73.1820](#) (a)(1)(i)]

Y P N/A

- b) STATION LOG REVIEW: Is the Station Log Tower Section reviewed by the Chief Operator weekly? [See [§73.1870](#)]

Y P N/A

G. RADIOFREQUENCY RADIATION EXPOSURE LIMITS

The FCC and other regulators require the operator of many sources of radiofrequency energy to limit the exposure of humans to high levels of Radiofrequency Radiation (RFR), also known as Non-ionizing Radiation (NIR) and Electro-Magnetic Radiation (EMR). The FCC's efforts in protecting humans from harm are outlined in [§1.1310](#) and [§1.1307](#). The implementation of these efforts is outlined in the FCC's Office of Technology's "OET Bulletin 65" with its three supplements ([OET-65](#)). Supplement A contains useful guidance specific to broadcast stations. (Note that as of January 2024, both OET-65 and its supplements are being revised.) Some additional requirements or conditions for compliance with the Commission's RFR rules may be specified in the TSA. Broadcasters are required to demonstrate their compliance with the Commission's RFR rules. This is generally done at the time of application for a new Construction Permit, but the responsibility remains with the broadcaster to maintain RFR compliance. This responsibility requires re-evaluating of compliance whenever any changes are made to the broadcaster's facility or to any other nearby facility that can contribute RFR energy to the human environment above prescribed levels. Re-evaluation may be a particularly involved process at sites with multiple high-power users.

Determination of compliance at locations with one or a few high-power radiators can be done by calculation as outlined in [OET-65](#). When more high-power radiators need be considered, measurements by a competent RF engineering firm may be required. The calculations or the measurements must be updated whenever changes are made at or near the facility. Changes to the height, location, power level or antenna type of any nearby high-power radiator can invalidate previous calculations or measurements. Retaining the appropriate documentation for these calculations or measurements to compare with the current facilities allows recognition of changes to the facility and demonstrates ongoing compliance to an inspection official. These documents are an important part of the Station Records.

Compliance with the findings of the calculations or measurements may require restricting access to areas where the RFR levels exceed the levels defined in the Commission's rules and guidelines. These restrictions may be implemented by locked fences, buildings or in some cases, by natural means. Persons working at locations that exceed public exposure limits must be trained prior to accessing those areas. Appropriate signage must be in place to alert persons who may be visiting the site, including unauthorized persons, of the potential for exposure in excess of the Commission's rules and regulations. Standard warning signs (available in multiple languages) exist for three levels of RFR exposure conditions: **Notice (blue) Caution (yellow) Warning (orange)**. Standards for RF safety programs, including training requirements and appropriate use of signage, are recognized by the FCC and are available at no cost through the [IEEE GET Program](#). See IEEE C95.7-2022. The correct signage in English and any other appropriate language(s) should be visible from each direction of approach to areas of RFR concern, and these must be maintained and replaced as needed. Proper signage is essential because over-signage or incorrect signage may incorrectly identify areas where exposure limits are exceeded, misstate the danger, and can confuse workers or the public.

Any site co-located with an electrically energized radiator accessible from the ground (most AM towers) must be fenced and protected with locked access. This fence must be sufficient in height and distance to prevent any contact with energized radiator components in addition to preventing RFR exposure

beyond the established limits. Such energized radiators should be marked with a **Warning (Red)** contact danger sign. [See [§1.1310](#), [§1.1307](#), [§73.49](#), [OET-65](#), [FCC FM Model](#) and TSA]

1. RFR COMPLIANCE

- a) EVALUATION REPORT AVAILABLE: Is a copy of the latest evaluation report of RFR at each transmitter site demonstrating RFR compliance of the current facility available in the Station Records?

Y P N/A

- b) FENCES AND/OR BARRIERS IN PLACE: Are all barriers and other protective measures outlined in the latest evaluation report of RFR at each transmitter site in place, in good repair and locked if required? Any site with an electrically energized radiator accessible from the ground (most AM towers) must be fenced or otherwise protected with a locked access. [[§73.49](#) and [§1.1307](#) (b)(4)]

Y P N/A

- c) RFR WARNING SIGNS IN PLACE AND APPROPRIATE: Do the areas defined in the latest evaluation report of RFR at each transmitter site that must be restricted have adequate warning signs in good repair, in the language(s) most common to the area and of the appropriate warning level visible from all directions of approach to restricted areas?

Y P N/A

- d) CONTACT DANGER SIGNS IN PLACE: Is an RFR Contact Danger sign located at each electrically energized radiator at ground level visible from every angle of approach to the radiator?

Y P N/A

RP	<i>In assuring that all station personnel are aware of the dangers of exposure to high levels of RFR, the broadcaster should maintain a written policy defining compliance, defining mitigating measures that may be taken and defining activities requiring such mitigating measures. This document should be part of the Procedures and Schedules defined elsewhere in this Guide and should be posted at the transmitter site as well as the employee bulletin board. All workers having access to areas exceeding the public exposure limit must receive appropriate training prior to accessing those areas. Persons other than workers (transient persons) accessing those areas must be supervised by qualified persons to ensure that exposure in excess of the public limits does not occur; the use of time averaging is required in such cases.</i>
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RP

Every tower represents an attractive nuisance to adventure minded people (free base jumpers and light fixture souvenir seekers). In the event someone is injured, killed or even falls ill to some malady that can be attributed to RFR, stations could find themselves in an unwarranted lawsuit. As a protection and to demonstrate concern for this attractive nuisance issue, every tower should be securely fenced with locking access and posted warning signs including;

- *RFR Warning Signs,*
- *No Trespassing Signs and*
- *Authorized Climbers with Appropriate PPE and Training Only Signs.*

These actions will not eliminate lawsuits in a mishap, but it might help shift the burden of responsibility to the trespasser.

SECTION III: EMERGENCY ALERT SYSTEM (EAS)

The FCC's rules governing the Emergency Alert System (EAS) rules are found in [Part 11](#). The rules now reflect the expansion of EAS into other services, including cable, DBS, wireless providers, and others, along with the move from the analog technology used in EBS to the digital technology used with EAS.

Operational EAS equipment capable of sending (except Class D Non-Commercial Educational FM and LPFM stations) and receiving EAS digital protocols must be installed at all broadcast stations. If there are any questions pertaining to the EAS rules broadcasters may wish to visit the FCC's EAS web site at <https://www.fcc.gov/emergency-alert-system>, or the FCC's Public Safety and Homeland Security Bureau website at <https://www.fcc.gov/public-safety-and-homeland-security>.

EAS security certificates and firmware details regarding the correct operation of the EAS system are updated from time to time. For an EAS system to function correctly, the latest most stable revision of the software for the specific EAS equipment must be installed.

RP

Most EAS equipment manufacturers offer a notification service advising of the availability of updates, some free and some with cost. It is recommended that the station utilize this notification service.

A. PARTICIPATING STATIONS

All broadcast stations are required to participate in the EAS. All stations must install EAS decoders. All stations except FM Class D, LPFM and LPTV must also install EAS Encoders connected to their program chains to produce properly formatted EAS messages on all free to the public streams (both analog and digital) broadcast by the station. FM translators are not required to be independently equipped with EAS equipment but shall rebroadcast the EAS information of their parent station. All stations are required to participate in National Activations and National Tests as well as the state originated Monthly Test of the EAS system. All stations are required to monitor local and state activations and to handle these activations as deemed appropriate by the station management after consulting the state EAS Plan. If exemptions from the EAS requirements are granted to a station by the FCC, the details of the exemption should be followed. [See [§11.11](#), [§73.403\(b\)](#) and [§11.41](#)]

1. EAS SYSTEM

- a) Has the licensee established procedures for ensuring the functionality of its EAS system?

N/A

B. EAS OPERATING DOCUMENTS

All stations are to maintain an FCC produced [EAS Operating Handbook](#) and the EAS state plans at all EAS control points (normal duty positions or EAS equipment locations) and to ensure both documents are available to staff responsible for verifying EAS messages and initiating actions. Copies of the FCC produced [EAS Operating Handbook](#) are currently available from the [FCC.GOV](#) website. [See [§11.15](#) and [§11.55](#)]

1. HANDBOOKS AND EAS STATE PLAN

- a) HANDBOOKS: Does the station have the current version of the EAS Operating Documents available at each EAS control point utilized during any portion of the broadcast day? [See [§11.15](#)]

N/A

C. EAS DECODER

All AM stations, with the exception of FM translator stations, must have equipment installed and capable of decoding the EAS Protocol as received via IPAWS, an LP1 Station, and an LP2 Station. Stations are required to monitor at least two assigned EAS stations, labeled as LP1 and LP2 as defined in the appropriate state plan for the station's location, and CAP via IPAWS. This equipment must be operational during all hours of broadcast operation. Manually operated equipment must be located so that operators, at their normal duty stations, can be alerted immediately when EAS messages are received. Only one EAS Decoder is required for a facility that is co-owned and co-located such as a combined AM, FM and TV studio. All EAS Decoders are to be certified by the FCC in accordance with Part 2 Subpart J of the FCC's rules. [See [§11.31](#), [§11.33](#), [§11.34](#), [§11.35](#) and [§11.52](#)]

2. DECODER

- a) CERTIFIED EQUIPMENT: Does the station use only certified equipment at each location utilized for EAS monitoring? [See [§11.34](#)]
 Y P N/A
-
- b) EQUIPMENT STATUS: Is the required EAS Decoder equipment currently installed and in operating condition? [See [§11.35](#)]
 Y P N/A
-
- c) CURRENT FIRMWARE: Is the latest most stable version of the EAS firmware provided by the equipment manufacturer installed on the equipment?
 Y P N/A
-
- d) UPDATE NOTIFICATION: Does the station have a procedure for maintaining the most current, updated version of its EAS firmware?
 Y P N/A
-
- e) INSTANTANEOUS ALERT RECEPTION: For manually operated EAS decoding equipment, is the decoder installed in a way that enables broadcast station staff to be alerted instantaneously upon receipt of an activation occurring during any portion of your broadcast operation? [See [§11.52](#)]
 Y P N/A
-
- f) UNATTENDED AUTOMATIC OPERATION: Is the station's EAS equipment configured to automatically interrupt programming when required during periods of unattended operation? [See [§11.52](#) (e)]
 Y P N/A
-
- g) MONITORING ASSIGNED STATION: Is the EAS Decoder tuned to receive EAS activations from the monitoring assignment priorities named in the State EAS plan. [See [§11.52](#)]
 Y P N/A
-

D. EAS ENCODER

All AM stations are to have installed and operational equipment capable of transmitting the EAS Protocol. The equipment may be installed for either manual or automatic activation of the Encoder. If manual activations are used, the EAS Encoder must be located so that station staff, at normal duty locations, can initiate the EAS code and Attention Signal transmission. Upon activation, an EAS Encoder shall generate audio information, which shall be transmitted on all streams, both analog and digital. [See [§11.31](#), [§11.34](#), [§11.35](#), [§73.403\(b\)](#) and [§11.51](#)]

An EAS Encoder for generating the EAS Protocol must be certified by the FCC. [See [§2.1033\(b\)](#).]

1. ENCODER

- a) CERTIFIED EQUIPMENT: Does the station maintain certified equipment capable of generating the EAS Protocol to modulate the transmitter so that the signal may be broadcast to other receiving stations? [See [§11.34](#)]

Y P N/A

- b) EQUIPMENT STATUS: Is the required EAS Encoder (encoding/generating equipment) currently installed and operational at this station? [See [§11.35](#)]

Y P N/A

- c) CURRENT FIRMWARE: Is the latest stable version of the EAS firmware provided by the equipment manufacturer installed on the equipment?

Y P N/A

- d) UPDATE NOTIFICATION: Does the licensee periodically check with its EAS equipment vendor of firmware and software updates?

Y P N/A

- e) LOCATION: For manually operated equipment, is the equipment positioned where responsible broadcast staff can initiate an activation during any portion of the broadcast day? [See [§11.51](#)]

Y P N/A

EAS announcements are to be in the same language as the primary language of the station. [See [§11.55](#) (c)(3) and [§11.61](#) (a)(1)(i)]

E. EAS TESTS

All AM stations are to conduct required weekly tests (RWT) of the EAS header and End of Message (EOM) codes a minimum of once a week at random days and times across all transport streams (TS), which can include any time of the day or night. In addition, required monthly tests (RMT) are to be retransmitted once a month as defined by the State Plan. The RWT is optional during the week that any activation has occurred during that week. All RMTs shall be retransmitted within 60 minutes of receipt and include the EAS header, 8-25 seconds of EAS Attention Signal, entire audio message, and EOM. [See [§11.61](#)] Finally, the FCC, in consultation with the Federal Emergency Management Agency (FEMA) periodically conducts Nationwide Tests of the Emergency Alert System (NPT, formerly called National Periodic Tests) of the EAS.

Stations are required to monitor two EAS sources and for CAP messages via IPAWS Open Platform for Emergency Networks (IPAWS-OPEN) that primarily uses an IP based network. Each station should receive at least one activation from each of the sources each week.

Stations are required to retransmit any national activation or test, any RMT, any state or local activation deemed appropriate by station management; and in the absence of any of the above retransmissions, the station must transmit a RWT at least once a week. The FCC has permitted licensees to program their EAS equipment to preselect which EAS messages containing state and local event codes they wish to retransmit.

The FCC has adopted rules that require stations to regularly poll for CAP messages via IPAWS and must give priority of retransmission of CAPS/IPAWS version of a message over messages received from other sources. [See [§11.55\(c\)\(2\)](#)]

If the station is not operating at the time (signed off the air, or experiencing technical difficulties) and an activation occurs, upon sign on or restoration of the transmission services, the station must review, log and take appropriate actions with respects to any activation that may have occurred.

Generally, no station should ever originate an EAS message except for a RWT. The state EAS Plan might contain limited exceptions to this where the plan requires local primary (LP1 or LP2), primary entry point (PEP) stations or other facilities to originate a RMT or other possible messages. Check the individual state plans for requirements.

1. EAS EVENT TRACKING

- a) CONDUCT WEEKLY EAS TESTS: Does the station conduct RWT transmission tests of the EAS header and EOM codes a minimum of once per week at random days and times? [See [§11.61](#) (a)(2)]

N/A

- b) CONDUCT MONTHLY EAS TESTS: Does the station initiate/retransmit, per the State Plan, RMT tests that include the EAS Attention Signal, audio message and EOM codes as required each month? [See [§11.61](#)(a)(1)]

N/A

- c) RECEIPT OF EAS TESTS: Did the station receive an EAS activation message (RMT, RWT or activation) during the last full calendar week from each of its assigned EAS monitoring sources? [See [§11.61](#) (a)]

N/A

RP	<i>EAS encoding and decoding devices should alert the Chief Operator and appropriate station personnel when there is an activation.</i>
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F. STATION LOG - EAS SECTION

All stations are to maintain a Station Log containing entries pertaining to each test and activation of the Emergency Alert System that is received, initiated or retransmitted by the station. EAS entries must be made in the Station Log either manually by responsible broadcast station staff or by an automatic device. Stations may keep EAS data in the EAS log which can be maintained at any convenient location and form. This log is also to contain entries which adequately describe the reason why the test activation was not received, and the action(s) taken to determine and correct the cause. Such a log must be considered a part of the official Station Log. [See [§11.35](#)(a), [§11.51](#) (m), [§11.55](#) (c)(6), [§11.61](#) (b) and [§73.1820](#) (a)(1)(iii)]

Whenever any EAS equipment becomes defective, the station may operate without the defective equipment, pending its repair or replacement, for a period not in excess of 60 days. The station must make appropriate entries into the Station Log showing the date and time the equipment was removed and restored to service. [See [§11.35](#) (b)]

If the station cannot restore the defective equipment to service within 60 days due to conditions beyond the control of the licensee, then the station must request an extension of this time from the FCC Regional Director of the area in which the station is located. Such request shall include the steps that were taken to repair or replace the defective equipment, the alternative procedures being used while the defective equipment is out of service and an estimation when the defective equipment will be repaired or replaced. [See [§11.35](#) (c)]

1. STATION LOG - EAS SECTION

- a) STATION LOG MAINTAINED: Does the licensee maintain a Station Log for the past two years containing an entry of each activation (both sent and received) of the Emergency Alert System (EAS)? [See [§11.51](#) (m), [§11.55](#) (c)(6), and [§73.1820](#) (a)(1)(iii)]

N/A

b) FAILURE TO RECEIVE EAS TEST: Does the Station Log contain appropriate entries indicating the reasons why required EAS Weekly/Monthly Test Transmissions were not received? [See [§11.35\(a\)](#)]

Y P N/A

c) EQUIPMENT OUTAGE: Does the Station Log contain appropriate entries documenting the date and time any EAS equipment was removed and/or restored to service? [See [§11.35 \(b\)](#)]

Y P N/A

SECTION IV: TECHNICAL REQUIREMENTS

A. POWER

Except for AM stations using modulation dependent carrier level (MDCL) control technology, AM stations are to maintain operating power between 90% and 105% of that authorization. The power is to be maintained as near as practicable to the station's authorized power. [See [§73.1560](#) (a) (1) and TSA]

In the event that an AM broadcast station is operating with excessive power (over 105%), the station operation is to be terminated within 3 hours after notice of the anomaly, unless corrective action is taken to reduce antenna input power sufficiently to eliminate any excess radiation and/or interference prior to that time. If interference to another station is likely, the corrective action or termination of broadcast should occur within 3 minutes. [See [§73.62](#)(b) and [§73.1350](#)(d)]

In the event that it becomes technically impossible to operate at authorized power, a station may operate at reduced power or be silent for a period of not more than 30 days without Special Temporary Authority (STA) from the FCC. If operation at reduced power or silent period will exceed 10 consecutive days, a notification must be made to the FCC's Media Bureau no later than the 10th day (with such notifications currently filed in LMS for AM stations).

If causes beyond the control of the licensee prevent restoration of the authorized power or resuming broadcasting within 30 days, a request for Special Temporary Authority (see [§ 73.1635](#)) must be made to the FCC via LMS for additional time as may be necessary.

If the licensee has notified the FCC of reduced power operation or filed an STA requesting long-term operation at reduced power or silent, the station must notify the FCC when normal power or operation is restored utilizing the FCC LMS. [See [§73.1560](#) and [§73.1635](#)]

B. DETERMINING OPERATING POWER

Except in those circumstances when it is not possible or appropriate to use the direct method of power determination the indirect method can be used; otherwise the operating power shall be determined by the direct method. [See [§73.51](#)]

AM stations may operate using modulation dependent carrier level (MDCL) without prior authorization provided the FCC is notified within 10 days of commencing operations. Regardless of the MDCL control technology employed, transmitters must achieve full licensed power at some audio input level or when the MDCL control technology is disabled. MDCL control operation must be disabled before field strength measurements on the station are taken. [See [§73.1560\(a\)\(1\)](#)]

All measurements should be taken with no modulation and with any MDCL temporarily disabled. Licensees must make certain that appropriate personnel know which method of power determination is being used, and how to calculate the output power. This must be detailed in the Station Log.

1. DIRECT POWER METHOD

Direct AM power may be determined in two manners. The first method is to utilize a suitable true power instrument (true RF Wattmeter which is one that utilizes the RF Voltage, RF Current and the cosine of the angle between the two) for directly measuring the transmitter output or antenna input power [[§73.51](#)].

The second method is by direct measurement of the RF current at the location of the last impedance (resistance) measurement as documented in the most recent FCC authorization. This location is generally the tower base for non-directional radiators and the Common Point for directional antenna systems but can also be at the transmitter output/input of the transmission line or (if requested in the license application and authorized) the ATU input. This location must be where the impedance (resistance) specified in the TSA was measured [[§73.51](#) (a)(2)] for all Modes of Operation ($P=I^2 \times R$). Stations which employ a transmitter or external meter that indicates true power output (computed

from current/voltage/phase angle) do not require an ammeter at the common point or ATU output. [§73.51 (a)(1)] The calibration documentation of the instrument(s) used should be maintained in the Station Records.

Unless the TSA specifies a direct reading power meter for determining power, RF Impedance (Resistance) measurements for each Mode of Operation are item(s) that must be maintained in the Station Records. If any changes are made above the base insulator of any AM radiator (such as new antennas mounted to the tower), these measurements must be redone and if any changes greater than 2% occur, the station TSA must be modified. [See §73.45, §73.54]

2. INDIRECT POWER METHOD

In the absence of a functioning true power instrument, and/or an RF current meter and the appropriate impedance measurements, the indirect method of power determination may be used temporarily. Indirect power is generally determined from the product of the RF final amplifier voltage (E_p), RF final amplifier current (I_p) and the efficiency factor (F) as prescribed in §73.51 (f).

$$\text{Transmitter output power} = E_p \times I_p \times F$$

Where:

- E_p = DC input voltage of final radio stage.
- I_p = Total DC input current of final radio stage.
- F = Efficiency factor of the transmitter.

Licensees must make certain that all duty operators know which method of power determination is being used (and how to calculate the output power if necessary).

RP	<p><i>It is a recommended practice that a label be affixed to all transmitters near the power meter containing:</i></p> <ul style="list-style-type: none"> ➤ <i>The Call Sign,</i> ➤ <i>Frequency,</i> ➤ <i>Licensed TPO,</i> ➤ <i>Upper and lower operating power limits and</i> ➤ <i>Efficiency Factor (F).</i>
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a) OPERATING POWER: Is the station's operating power between 90% and 105% of that authorized? [See TSA and §73.1560]

Y P N/A

a) DIRECT vs INDIRECT METHOD: The operating power of AM stations may be determined by either the direct or indirect method. Do the duty operators know what method is being used to determine operating power? [See §73.51]

Y P N/A

b) EFFICIENCY FACTOR: Is the efficiency factor known for each transmitter used and a record kept as to its value, along with the source from which this value was determined? [See §73.51]

Y P N/A

b) CHIEF OPERATOR OBSERVATION: Has the station's Chief Operator recently determined that the station is operating within its current licensed parameters?

Y P N/A

C. ANALOG TRANSMISSION STANDARDS

The departure of the carrier frequency of an AM station may not exceed 20 Hz from that authorized frequency. [See [§73.1545](#) (a)]

1. FREQUENCY

a) FREQUENCY: Is the station in compliance with the frequency tolerance specified in [See [§73.1545](#)]?

N/A

RP	<i>It is recommended that frequency measurements should be taken every 12 months not to exceed a 14-month interval. Measurements should be kept in the maintenance logs for the transmitter. Frequency measurements should be taken with the Carrier Un-Modulated.</i>
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2. ANALOG MODULATION

The Modulation Envelope of an AM station must not be permitted to exceed 100% on negative and 125% on positive peaks of frequent reoccurrence. For accuracy, modulation must be measured by connecting directly to the transmitter's sample ports.

a) MODULATION: Is the modulation being observed as often as necessary and in each Mode of Operation to assure the limits of the AM envelope are not exceeding 100% negative (pinchoff) or 125% positive? [See [§73.1570](#)]

RP	<i>It is recommended that negative peaks of modulation be limited to 95% to 98% to prevent carrier pinchoff (momentary disappearance of the carrier). Carrier pinchoff may create significant interfering products (splatter) that can be harmful to other broadcasters.</i>
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RP	<i>Modulation monitors need to be periodically certified for proper operation and accuracy. Peak flashers on the modulation monitors should be set for 98% Negative Peaks and 125% Positive Peaks and should not flash more than 4 times per minute. Stations are not required to have modulation metering installed but are required to maintain compliance with the modulation requirements and to have access to a means of measuring the modulation.</i>
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D. IBOC TRANSMISSION STANDARDS

Stations that are broadcasting hybrid or digital only signals (In Band on Channel (IBOC)) should maintain the modulation levels as defined by the IBOC Transmission Standard. In addition, diversity delay between the analog and digital signals should also be monitored and maintained within the IBOC specifications.

Stations broadcasting using IBOC must transmit at least one over-the-air programming stream at no direct charge to listeners, must simulcast its analog audio programming on its HD1 digital audio programming stream, and this stream must be at least comparable in quality to its analog broadcast. Additionally, all free digital audio broadcasting (DAB) programming streams must adhere to the emergency information requirements specified in [§73.1250](#). [See [§73.403](#) and [§73.1250](#)]

Technical parameters for IBOC operation are codified in [§73.404](#), which references MM Docket 99-325 for AM and FM in addition to [MM Docket 13-249](#) and [MM Docket 19-311](#) for all digital AM.

Stations ready to commence IBOC operation or changing any mode or parameters of operation are to notify the FCC prior to beginning broadcasting in the new desired mode of operation. Each station

that has previously notified the FCC that they are operating in any digital mode is to notify the FCC of the reversion to fully analog operation. The notification requirements have different time requirements depending on the type of change and information requirements. All notifications are to be made via AM/FM Digital Notification in the FCC’s LMS. A copy of the latest notification should be kept in the Station Records. [See [§73.406](#)]

1. DIGITAL MODULATION

- a) MODULATION: Is the station in compliance with the modulation standards, limits and diversity delay (time alignment to allow for proper blend to analog) specified in the IBOC Transmission Standards? [See [§73.404](#) and its references]

Y P N/A

- b) DIGITAL NOTIFICATION: Has the correct notification for the current mode and parameters of digital or analog operation been made to the FCC with a copy retained in the Station Records?

Y P N/A

- c) ANALOG SIMULCAST: In hybrid mode, is the station broadcasting its analog signal on the HD1 digital stream with sufficient quality?

Y P N/A

E. MODES OF OPERATION

1. CHANGE OF MODES OF OPERATION

During nighttime, AM signals can travel great distances by reflecting off the ionosphere. These nighttime signals can cause, and for other stations to receive, significant interference rendering reception unusable over large areas. To help mitigate this interference, AM stations are often prescribed reduced operating power, and/or Directional Antennas (addressed below) for different parts of the broadcast day. These combinations of power levels and/or directional antennas (if used) define Modes of Operations that are specified in the TSA as are the times these Modes of Operations are to start. It is critical that the Mode of Operations change occurs within 3 minutes of the prescribed times, which vary from month to month, as specified in the TSA. If the station cannot set the Mode of Operations for the current period and its operations will cause interference to other stations, the station must reduce power as needed to prevent interference or be taken off the air within 3 minutes.

Observations by the Chief Operator and/or other personnel confirming that the change in the Modes of Operations has properly occurred or alarms notifying the appropriate people that it has not properly occurred should be in place. Logs with sufficient detail to demonstrate timely compliance with every Modes of Operations must be kept and need to be reviewed by the Chief Operator weekly. [See TSA, [§73.1560](#), [§73.99](#), [§73.1350](#), [§73.1735](#) and [§73.1745](#)]

RP

It is common practice to utilize the station’s automated remote-control system to initiate changes in Modes of Operations, and to also utilize the same remote-control system to monitor, notify and log the successful change in the change Modes of Operations. This creates the possibility that a single failure of that system could cause the stations to fail to change Modes of Operations, and also to fail to log, notify and/or take corrective actions. It is recommended that an engineered solution be in place and documented to prevent this single point of failure and its consequences.

a) **PROCEDURES AND SCHEDULES:** Does the station have the Procedures and Schedules necessary to initiate and to assure that every Mode of Operation change specified in the TSA is occurring and is this documentation placed where appropriate?

Y P N/A

b) **MODE OF OPERATION CHANGES:** Are the required changes in the Mode of Operation being executed within 3 minutes of the times prescribed in the TSA?

Y P N/A

c) **LOGGING OF CHANGES:** Are all changes in the Mode of Operation being accurately logged with times of execution and sufficient parameters recorded to demonstrate compliance with the TSA?

Y P N/A

2. DIRECTIONAL ANTENNA

a) **DIRECTIONAL ANTENNA:** Does the station use an AM Directional Antenna (multiple towers at the transmitter site) for operation? (See TSA) If answered N, skip to 5 below.

Y N

Many AM stations, in addition to changing their operating power at the time of the change in Mode of Operation also change the pattern of their antenna system or change the antenna system from which they broadcast. Often these antenna patterns are directional for some or all Modes of Operation, which require multiple towers, and this requires reconfiguring the antenna system via electrical or manual switching. It is necessary to measure the ratio of the tower current and the relative phase to each utilized tower in the antenna system to determine if the pattern is being correctly formed. This monitoring is done by an FCC approved Antenna Monitor. The specific Antenna Monitor to be utilized is specified in the TSA. Antenna Monitors are part of the Antenna Sampling System which includes the monitor itself, sampling elements deriving a sample from each tower and the interconnecting lines and equipment. Antenna Sampling Systems can be FCC-approved if built per FCC specifications and those not FCC approved have more detailed monitoring and logging requirements [See [§73.1820\(2\)](#), [§73.53](#) and [§73.68](#)].

Shortly after the change in the Mode of Operation, the parameters displayed on the Antenna Monitor should be confirmed, either manually, by the remote-control system, or by an automatic transmitter control system, to be within the parameters specified in the TSA. If the parameters are not within the prescribed tolerance sufficient power reduction to prevent any interference to any other broadcaster or termination of the station's output must occur within 3 minutes of the change in the Mode of Operation.

b) **Directional Parameters:** Does the station power and all Antenna Monitoring System readings agree within the prescribed tolerance (usually 5% of the prescribed ratio and 3° of the prescribed phase) of the values specified in the TSA for all Modes of Operation? [See [§73.62](#) and TSA]

Y P N/A

Beyond observing that the station power is correct, and the parameters displayed on the Antenna Monitor are correct, there are additional requirements to demonstrate that the directional system is functioning correctly. The FCC has prescribed two methods to demonstrate pattern compliance, both when the system is initially constructed or modified, and for the required periodic confirmation evaluations. These two methods are (1) field strength measurements along prescribed directions (radials) and distances from the antenna system or (2) by computer modelling of the antenna system. The computer modeling method (Method of Moments) can be used by most stations with base-fed (series fed) towers. The method used to demonstrate pattern compliance is specified in the TSA and each is discussed below.

c) **METHOD OF MOMENTS:** Does the station utilize the Method of Moments computer modeling for its demonstration of directional antenna compliance for each mode of directional operation? If yes, skip to Method of Moments – Section 4 below).

Y N/A

3. FIELD MEASUREMENT CONFIRMATION OF DIRECTIONAL ANTENNA OPERATION

AM stations must periodically make field measurements to confirm that the directional antenna pattern is correct and unaffected by outside influences. Field strength measurements are performed with an AM Field Intensity Meter (FIM) to demonstrate that a directional antenna system is operating in compliance with the TSA. Monitor Points (MPs) are specific locations specified in the TSA, and MP measurements are to be taken with an FIM as often as necessary for directional antennas with an FCC Approved Sampling System and at a minimum of once every 120 days for directional antennas without an FCC Approved Sampling System. These measurements are to demonstrate that the field strengths at the prescribed Monitor Points do not exceed the values prescribed in the TSA for each MP. These measurements, including the date and time of the measurements and the make, model and serial number of the FIM utilized along with its calibration information, are to be logged and this information kept as part of the Station Log. If the licensee has reason to believe that the radiated field may exceed the limits in the TSA, more extensive measurements are needed and may require the assistance of the station’s Consulting Engineer. [See [§73.61](#) and [§73.62](#)]

The location and route to each of the MPs were generally described in the TSA, but many recent licenses do not contain this information and include only the field strength limit and the geographic coordinates. As time passes the location and route description (if present) listed in the TSA may become outdated, or the point itself may become unreliable due to urbanization or other local changes. It is the licensee’s responsibility to update these descriptions whenever necessary by informal notification to the FCC to assure that the MPs can be easily located and accessed. If a MP becomes unusable then the procedure in the rules ([§73.158](#)) should be followed to change the point.

The complete history of all measurements, the initial and/or modification design, Construction Permit, and detailed notes about any changes made to the directional antenna should be maintained in the Station Records as all of this information may be necessary in making adjustments to a directional antenna system should the system fall out of compliance with its design. [See [§73.61](#), [§73.154](#), [§73.158](#) and TSA]

RP	It is recommended that stations with an FCC Approved Sampling System take Monitor Point Field Strength Measurements at least once per quarter as is required for stations without an FCC Approved Sampling System. Often, directional antennas require minor adjustments when the seasons change, particularly Fall and Spring, and confirmation measurements should be taken after such minor adjustments.
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RP	It is recommended that when a route and description to a Monitor Point location is updated that the updated information includes not only the route description but also includes the geographic coordinates and the official street address, if available, of the Monitor Point. An electronic map route for a navigation system is of great assistance in documenting these Monitor Point descriptions.
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RP	Maintenance and modification of an AM directional antenna system can be quite involved and is greatly aided by having the complete documentation history for the system. It is recommended that all documentation starting from the original construction permit application for the station to the present time be preserved in the Station Records with a copy at the transmitter site. This documentation includes all
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	field strength measurements, all Construction Permits and their underlying applications, all applications for Licenses to Cover a Construction Permit or Return to Direct Power Determination applications, all requests for special temporary authority and the resolution of such STA conditions, and their underlying applications, communications, measurements and maps, and all impedance measurements.
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a) **FIELD STRENGTH MEASUREMENTS:** Are all recent field strength measurements available in the Station Log?

Y P N/A

b) **MONITOR POINT FIELD STRENGTH:** Are the latest measurements of field strength at the Monitor Points at or below values specified in the TSA?

Y P N/A

c) **MONITOR POINT DESCRIPTIONS:** Are the Monitor Point descriptions and routing (if present) accurate to permit easy location of each Monitor Point?

Y P N/A

d) **ANTENNA MONITOR:** Is the station utilizing an FCC Approved Sampling System and is it fully operational?

Y P N/A

e) **ANTENNA MONITOR LICENSE:** Does the Antenna Monitor Make and Model agree with the Antenna Monitor specified in the TSA?

Y P N/A

f) **FIM AVAILABLE:** Does the station have access to a calibrated or known correct FIM with calibration details in the Station Records?]

Y P N/A

g) **SUPPORT DOCUMENTATION:** Are all Antenna Monitor System Certifications, all Construction Permits and their underlying applications, all Licenses to Cover a Construction Permit or Direct Power Determination applications and their underlying applications and measurements, field strength measurements, maps and descriptions, and all impedance measurements available in the Station Records (perhaps maintained at the transmitter site)?

Y P N/A

RP	The available FIM should be calibrated by its manufacturer as often as recommended or favorably compared to another FIM which has had its calibration checked as specified by its manufacturer and has a valid calibration certificate at the time of the comparison.
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4. DIRECTIONAL ANTENNAS LICENSED BY METHOD OF MOMENTS

If your station is not a Method of Moments-based directional antenna systems (MOM) then skip to paragraph 5 below.

MOM stations rely heavily on measurements taken from the Antenna Monitor to demonstrate pattern compliance. When operating on a system specified by Method of Moments in the TSA, demonstration of pattern compliance is based on values shown by the Antenna Monitor with observations that the Antenna Monitor System is operating correctly. Field strength measurements are not necessary as part of the normal demonstration of pattern compliance. Periodic field measurements are not required provided the Antenna Monitoring System (Antenna Monitor, tower sampling devices, isolation devices and all interconnecting lines) is operating correctly. However, if any part of the Antenna Monitoring System becomes unstable and/or requires repair, complete

confirmation and documentation of the repairs and measurements identical to the initial confirmation of the Antenna Monitoring System are required. It might be necessary to operate the system with an STA for parameters at variance with licensed parameters during this repair and recertification. By definition, MOM Antenna Sampling Systems must be FCC-Approved. [See [§73.155](#)]

a) **ANTENNA MONITOR READINGS:** Do the readings agree within the prescribed tolerance (usually 5% of the prescribed ratio and 3° of the prescribed phase) of the values specified in the TSA? [See [§73.62](#)]

N/A

b) **ANTENNA MONITOR FUNCTIONAL:** Does the Antenna Monitor pass any self-tests (if applicable) and appear to be fully functional?

N/A

c) **ANTENNA MONITOR MODEL CORRECT:** Does the Antenna Monitor Make and Model agree with the Antenna Monitor specified in the TSA?

N/A

d) **DOCUMENTATION:** Are all Antenna Monitor System Certifications, all Construction Permits and their underlying applications, all Licenses to Cover a Construction Permit or Direct Power Determination applications and their underlying applications and measurements, field strength measurements, maps and descriptions, and all impedance measurements available in the Station Records?

N/A

5. AM ANTENNA SYSTEM CHANGES

No changes may be made to any tower of an AM antenna system above the base insulator without confirming that no impact has occurred to the base impedance or (if directional) the operation of the directional antenna system. [See [§1.30003 \(a\) and \(b\)](#)] Should any changes be necessary, at a minimum the base impedance of the tower for a non-directional antenna should be re-measured and if it has changed more than 2% from the licensed value, the license should be modified. In the case of directional antenna systems additional evaluations are necessary. [See [§73.45\(c\)](#)]

For directional antenna systems whenever a change is going to be made above the base insulator or any change in the vicinity of the antenna for field strength determined directional antenna stations, field measurements must be made before and after the changes to demonstrate that no impact on the directional antenna has occurred due to the change. For Method of Moments determined directional antenna systems, base impedance measurements and, if any change has occurred, modification of the MOM model are required to demonstrate that no impact on the directional antenna will/has occur. For situations where construction is occurring near the directional antenna system, base impedance and/or MP measurements may be required to confirm that the construction does not affect the operation of AM antenna. [See [§1.30000](#) and [§1.30002](#)].

An exception is made to stations utilizing direct reading power meters provided notification is made to the FCC. [See [§73.54\(d\)](#)]

F. BROADCAST TRANSMITTERS

Main transmitters used for broadcast must be approved by their manufacturer with a Supplier's Declaration of Conformity (SDoC) or must be Type Accepted (older units). [See [§73.1660](#), [§73.1690\(e\)](#), [§73.1665](#) and [§Part 2 Subpart J](#)]

AM broadcast stations must have at least one main transmitter which complies with the provisions of the transmitter technical requirements for the type and class of station. A main transmitter is one

which is used for regular program service having power ratings appropriate for the authorized operating power(s). [See §73.1665 and §Part 2 Subpart J]

Modification(s), electrical and mechanical, to authorized transmitting equipment that is not otherwise restricted by the preceding provisions of this section ([§73.1690](#)), may be made without FCC notification or authorization. Equipment performance measurements must be made within ten days after completing the modifications (See [§ 73.1590](#)). An informal statement, diagram, etc., describing the modification must be retained at the transmitter site for as long as the equipment is in use.[See [§73.1690\(e\)](#)]

In addition, as a reminder for replacement transmitters, within 10 days after commencement of regular use of the replacement or additional transmitter(s), Equipment Performance Measurements, as prescribed for the type of station are to be completed. [See [§73.1665\(c\)](#)]

1. FCC APPROVED

- a) TYPE ACCEPTED or APPROVED: Does each main transmitter in operation have a manufacturers Type Acceptance Number (pre-2017) or have a Supplier's Declaration of Conformity?

N/A

- b) TRANSMITTER REPLACEMENT: If a transmitter has been replaced, are Equipment Performance Measurements made after the replacement with all the supporting documentation about the replacement kept in the Station Records for as long as the transmitter is in use?

N/A

- c) TRANSMITTER MODIFICATION: If a transmitter has been modified, are Equipment Performance Measurements made after the modification with all the supporting documentation about the modification kept in the Station Records for as long as the transmitter is in use?

N/A

G. TRANSMISSION SYSTEM OPERATION

Each licensee is responsible for maintaining and operating its broadcast station in a manner which complies with the rules. [See [§73.1350\(a\)](#)]

System adjustments can be made directly at the transmitter site or by using control equipment at an off-site location. The control equipment must have the capability to turn the transmitter off at all times. If operating personnel are at a remote location, the control system must provide this capability continuously or must include an alternate method of acquiring control that can satisfy the requirement of §73.1350 (d) and (e), that operation be terminated within three hours or three minutes, respectively.

RP

It is recommended that stations employ at a minimum, remote control of the transmitter, both on and off functions of the transmitter itself, as well as monitoring the parameters of the transmitter, including [§73.1560\(b\)](#) regarding operating power, [§73.1570\(b\)\(2\)](#) regarding modulation levels, and, where applicable, [§73.1213\(b\)](#) regarding antenna tower lighting, Power Amplifier (PA) Voltage, PA Current, and Forward and Reflected Power.

It is also recommended that when these parameters are out of tolerance, the device be able to contact the appropriate parties via electronic means within three minutes of such out of tolerance conditions, given the requirement to terminate operation or reduce antenna input power sufficiently to eliminate any excess radiation in the event the station begins operating in a manner that poses a threat to life or property or that is likely to significantly disrupt the operation of other stations. If the three-minute requirement is met, then the three-hour requirement will be covered too.

Examples of conditions that require termination of operation within three hours include excessive power, excessive modulation or the emission of spurious signals that do not result in harmful interference. [See [§73.1350\(d\)](#)]

Examples of conditions that require immediate corrective action within three minutes include the emission of spurious signals that cause harmful interference, any mode of operation not specified by the station license for the pertinent time of day, or operation substantially at variance from the authorized radiation pattern. [See [§73.1350\(e\)](#)]

If a station is operating in a manner that is not in compliance with one of the following technical rules, operation may continue if the station complies with relevant alternative provisions in the specified rule section. [See [§73.1350\(f\)](#)]

Also see -

- Reduced power operation, see [§73.1560\(d\)](#);
- Reduced modulation level, see [§73.1570\(a\)](#);
- Emergency antennas, see [§73.1680](#).

H. TRANSMITTER METERING & CONTROL

All AM stations are to maintain sufficient indicators to determine compliance with required transmitter power and modulation requirements. All stations must have personnel who maintain the ability to turn off the transmitter. [See [§73.1350](#)]

1. TRANSMITTER CONTROL

- a) CONTROL: Does the equipment at this station allow transmitter control personnel the ability to turn the transmitter off at any time the station is in operation? [See [§73.1350\(b\)\(2\)](#)]

N/A

- b) OPERATING PARAMETERS: Does the licensee maintain necessary metering to determine compliance with power and modulation requirements? [See [§73.1350\(c\)](#)]

N/A

RP	<p><i>It is recommended that stations employ at a minimum, remote control of the transmitter, both on and off functions of the transmitter itself, as well as monitoring the parameters of the transmitter, including Power Amplifier (PA) Voltage, PA Current, and Forward and Reflected Power. It is also recommended that when these parameters are out of tolerance, the device be able to contact the appropriate parties via electronic means within three minutes of such out of tolerance conditions, given the requirement to terminate operation or reduce antenna input power sufficiently to eliminate any excess radiation in the event the station begins operating in a manner that poses a threat to life or property or that is likely to significantly disrupt the operation of other stations.</i></p>
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I. MONITORING PROCEDURES AND SCHEDULES

The licensee must establish monitoring procedures and schedules for the station to ensure its proper technical operation. Monitoring procedures and schedules must enable the licensee to determine compliance with operating power, modulation levels and antenna tower lighting (where applicable). Licensees should be able to provide upon request by the FCC the monitoring procedures and schedules established for each station. [\[§73.1350\(c\)\]](#)

1. PROCEDURES AND SCHEDULES

- a) Has the licensee established Procedures and Schedules for monitoring the power, modulation, tower lighting (where applicable) other critical parameters at this station, other critical parameters, and in compliance with FCC and IBOC standards at this station? [See [§73.1350\(c\)\(1\)](#)]

N/A



<p>RP</p>	<p><i>Procedures and Schedules are recommended to aid in training, remind personnel of what needs to be done for FCC compliance, and to help demonstrate to the FCC what is being done.</i></p> <p><i>Items that should be considered for a Procedures and Schedules entry include transmitter power management, quality measurements, frequency measurements and modulation measurements, and tower lighting (where applicable).</i></p> <p><i>In addition, the Emergency Alert System (EAS) should have Procedures and Schedules for proper maintenance and discovery of technical issues related to its operation. [See §73.1350(i)]</i></p> <p><i>Monitoring equipment must be periodically calibrated to provide reliable indications of transmitter operating parameters with a known degree of accuracy.</i></p> <p><i>Items that could also be documented are how tower lighting is being monitored and tested and how the Station Log is being maintained.</i></p> <p><i>Many maintenance requirements specified in the FCC Rules are “as often as necessary” and the Procedures and Schedules documents are a helpful place to define what this means to the specific operation. The Procedures and Schedules document is a good place to keep institutional knowledge and help maintain excellent facilities.</i></p> <p><i>Licensees should be able to provide, upon FCC request, Procedures and Schedules they have established for each station.</i></p>
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<p>RP</p>	<p><i>It is recommended that periodic observation of power output, modulation monitor, EAS, and tower lights be made at least every three hours by an operator or if operating in an unattended mode, measurement should be automatically logged by an automated system hourly. The personnel observing or being notified of out of tolerance conditions should be able to take corrective action within three minutes of such observation or notification.</i></p>
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J. INSPECTION AND CALIBRATION

The licensee must maintain indicating instruments and conduct periodic complete inspections of the transmitting system, all required monitors and automatic logging devices to ensure proper station operation. Monitors and automatic logging devices must be periodically calibrated to provide reliable indications of transmitter operating parameters with a known degree of accuracy. The determination as to how frequent the complete inspection and calibrations are to occur is up to the licensee. The licensee should make certain that the date of calibration of each device is entered in the Station Log along with any other resulting actions associated with the calibration, such as replacement of a meter or other device. The licensee may keep calibration data in a special calibration log; however, such a log must be considered a part of the official Station Log and as such must be made available upon request. [See [§73.1350\(c\)](#), [§73.1580](#) and [§73.1820](#)]

1. INSPECTION AND CALIBRATION

- a) INSPECTION: Has the licensee established Procedures and Schedules for conducting periodic inspection of the transmitting system and all monitors? [See [§73.1350\(c\)](#) and [§73.1580](#)]
- a) CALIBRATION: Has the licensee established Procedures and Schedules for conducting periodic calibrations of these devices? [See [§73.1350\(c\)](#) and [§73.1580](#)]

Y P N/A

RP	<p><i>The licensee should make certain that the date and results of calibration of each device are entered in the Station Records along with any other resulting actions associated with the calibration, such as maintenance, adjustments, replacement of a meter and/or of other devices. The licensee may keep calibration data in a separate calibration log; however, such log must be considered a part of the official Station Records and as such must be made available upon request.</i></p> <p><i>It is recommended that the Chief Operator review and note calibration procedures periodically.</i></p>
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RP	<p><i>It is recommended remote control devices be periodically calibrated to within 2% of their true reported original readings, and that out of tolerance alarms/message delivery be tested at least once a month. These calibration procedures should be recorded in the maintenance logs. [See §73.1215(a)(2)]</i></p>
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- c) CALIBRATION TOLERANCE: Can the licensee demonstrate that the calibration is within 2% of the true reading?
- d) MAINTAINING STATION RECORDS: Are the results of such calibration documented? [See [§73.1820](#)]

Y P N/A

K. MEASUREMENTS

The station should periodically take measurements to assure compliance with FCC Rules and Regulations as well as industry standards. Such measurements require dedicated equipment, which should be readily available to the station.

1. DOCUMENTATION

- a) SPURIOUS AND HARMONIC EMISSIONS: Is the station in compliance with the station's licensed parameters, FCC Rules and NRSC Standards regarding emissions?

Y P N/A

SECTION II: ATTENDED VS UNATTENDED OPERATION

A. ATTENDED VS UNATTENDED

Broadcast stations may be operated either attended (where a designated person responsible for proper transmitter operation is at the transmitter site or a remote-control point) or unattended (where the equipment will notify a responsible person of issues that need attention). No prior FCC approval is required to operate a station in unattended mode. Regardless of which method of station operation is employed, licensees must employ procedures which will (1) ensure compliance with the EAS rules, (2) ensure that the station is able to take immediate corrective action or terminate station operations within three minutes of observing an out-of-tolerance condition that poses a threat to life or property, or is likely to significantly disrupt the operation of other stations (i.e., causes harmful interference); and (3) ensure that the station is able to terminate operations within three hours in the event a qualifying out-of-tolerance condition arises (i.e. excessive power, excessive modulation, or the emission of spurious signals). [See [§73.1300](#), [§73.1350](#) and <https://www.fcc.gov/media/radio/unattended-operation>]

1. ATTENDED OPERATION

Attended operation consists of ongoing supervision of the transmission facilities by a station employee or other person designated by the licensee either at the transmitter site, a remote-control point, or an ATS control point. Such supervision may be by direct observation and control of the transmitting system by a live person at the transmitter site, direct observation of the transmitter's Graphical User Interface (GUI) at a remote location or remote control, or such supervision can be by automated equipment that is configured to contact a person designated by the licensee. Other than a fully automated station where the station's control and monitoring equipment makes any adjustments necessary without human intervention, a live person must be on duty at a FIXED location during all hours of broadcast operation where they can turn off the transmitter and where they can either monitor the station operating parameters themselves or be contacted by the automated equipment which is monitoring the equipment for them. [See [§73.1350](#) and [§73.1400\(a\)](#)]

RP	<i>During attended operation in the absence of a notifying Remote Control/ATS system, §73.1400 (a)(1)(i) requires direct supervision of the transmission system. It is recommended that at a minimum this requires the transmitter to be observed at least every 3 hours directly or by a remote-control system. Other quality and content parameters should also be monitored.</i>
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a) ATTENDED OPERATION: During attended operation, are the designated people supervising the transmission equipment observing the station parameters?

Y P N/A

2. UNATTENDED OPERATION

Unattended operation consists of using remote or automatic transmission system (ATS) monitoring equipment to control the transmission system, or alternatively, operation in the absence of constant human supervision with equipment that can operate for prolonged periods of time within assigned tolerances and parameters. In the former case, equipment must be configured to automatically correct the out-of-tolerance operation or take the station off the air within the required 3-hour time period after an out-of-tolerance condition arises. In the latter case, the licensee is required to make certain that the station is monitored frequently enough to ensure that station operation is corrected or terminated within the designated 3-hour time limit, but constant human supervision is not required. If automatically adjusting monitor and control equipment is not employed, suitable equipment must be employed which is expected to operate within assigned tolerances for extended periods of time without constant human monitoring. [See [§73.1350\(c\)](#) and [§73.1400\(b\)](#)]

a) UNATTENDED: Does the licensee maintain either self-monitoring, remote control or ATS-monitored and controlled equipment capable of notifying appropriate personnel of an out-of-tolerance condition, correcting the out of tolerance operation and/or terminating operations within 3 hours after an out-of-tolerance condition arises? [See [§73.1350](#) (c) and [§73.1400](#)(b)]

Y P N/A

b) ATTENDED: Does the licensee maintain a person on duty at a fixed location (Control Point) during all periods that the station is on the air where they can either monitor and control the station themselves or be contacted by automated transmitter monitoring equipment in the event an out-of-tolerance condition arises? [See [§73.1350](#)(c) and [§73.1400](#)(a)]

Y P N/A

3. NOTIFICATION

Whenever a transmission system Control Point is established at a location other than at the Main Studio or transmitter, then notification of that location must be filed in the LMS within 3 days of the initial use of that point. This notification is not required if responsible station personnel can be contacted at the transmitter or studio site during all hours of station operation. This notification must list all Control Points in use. [See [§73.1350](#)(h)]

a) NOTIFICATION: Has the licensee notified the Media Bureau in writing (via the LMS) of the location of all transmission system Control Point(s) other than the Main Studio or transmitter location?? [See [§73.1350](#)(h)]

Y P N/A

RP

It is recommended that a copy of this notification be retained in the Station Records. Always keep a copy of what is sent to the FCC.

SECTION III: LOCAL MARKETING AGREEMENTS (LMA), TIME BROKERAGE AGREEMENTS (TBA) AND JOINT SALES AGREEMENTS (JSA)

A. DEFINITION

In North American broadcasting, a Local Marketing Agreement (LMA), or local management agreement, is a contract in which one company agrees to operate a radio or television station owned by another party. In essence, it is a sort of lease or time-buy.

A Time Brokerage Agreement (TBA) is the lease by a licensee of discrete blocks of time to a "broker" that supplies the programming and commercial spot announcements to fill that time.

A Joint Sales Agreement (JSA) is an agreement between licensees that authorizes a station to sell advertising time on another station.

Under antitrust law, the legality of such arrangements by independently owned broadcast stations must be considered on a case-by-case basis. The station licensee is always ultimately responsible for the content being broadcast and cannot relinquish control of the station through these arrangements. If there are questions concerning these arrangements, contact legal counsel.

NOTE: Stations also sometimes enter into a similar, but conceptually different, agreement called Shared Service Agreements ("SSAs") in which certain services are shared between stations (such as back-office support functions).

1. LMA/TBA AND/OR JSA STATUS

- a) LMA/TBA AND/OR JSA STATUS: Has this station been engaged in a local marketing, time brokerage, or joint sales agreement during any portion of the current term of the station authorization?

Y P N/A

NOTE: If this station has not been engaged in a time brokerage, local marketing, or joint sales agreement during any part of the current term of the station license or other authorization, then you are not required to answer any further questions contained in this section (Section VI).

2. FILING OF CONTRACTS

All stations involved in an LMA, TBA, or JSA must file a copy of the agreement in the stations' Public Inspection File. In addition, the LMA, TBA, or JSA agreement must be placed in each affected station's PIF within 30 days of execution. Confidential or proprietary information may be redacted in the copies placed in the Public Inspection File. [See [§73.3526\(e\)\(14\)](#) and [§73.3613\(d\)](#)]

Agreements still in effect and which are required to be furnished to the FCC upon request in accordance with [§73.3613](#), are to be listed in licensees' and attributable parties' biennial ownership reports. This list shall include the date of execution and the expiration of each contract and the list shall document any interest which the licensee may have in any other broadcast station. [See [§73.3615](#) and [§73.3526\(5\)](#)]

- a) FILING: Has the licensee uploaded a copy of the LMA, TBA, and/or JSA to its PIF within 30 days of execution of the agreement?

Y P N/A

- b) LISTS: Has the licensee provided a list of all contractual agreements in effect along with the ownership report?

Y P N/A

3. CONTROL OF THE STATION UNDER LMA/TBA

Licensees are required to maintain control of their stations regardless of who is brokering the station under an LMA, TBA or any other kind of agreement. [See [Title 47 United States Code Chapter 5, Subchapter III, Part I, Section 310\(d\)](#), [§73.3540](#) and [§73.3555\(j\)\(3\)](#)]

- a) CONTROL: Has the licensee maintained control over this station under these lease agreements?

Y P N/A

4. MAIN STUDIO

The licensee still has responsibilities to maintain a Main Studio. [See Section I E and [§73.1125](#)]

- a) Does the licensee maintain and publish a local telephone number in its community of license or a toll-free number?

Y P N/A

5. FOREIGN GOVERNMENT PROVIDED PROGRAMMING DISCLOSURE

- a) DISCLOSURE OF FOREIGN PROVIDED PROGRAMS: Has the licensee assured that foreign government provided programming been properly identified and the proper disclosure made during each airing of such a program? [See Section I-D-11 and [§73.1212\(j\)](#)]

Y P N/A

APPENDIX I. ABBREVIATIONS

§	Abbreviation for FCC Rule section (47 CFR)
AGL	Above Ground Level
AM	Amplitude Modulation
AMSL	Above Mean Sea Level
ANSI	American National Standards Institute
ATS	Automatic Transmission System
CAP	Common Alerting Protocol
dB	Decibel
EAS	Emergency Alert System
ERP	Effective Radiated Power
F	Transmitter Efficiency Factor
FAA	Federal Aviation Administration
FCC	Federal Communications Commission
FM	Frequency Modulation
JSA	Joint Sales Agreement
HAAT	Height Above Average Terrain
kHz	Kilohertz
LMA	Local Marketing Agreement
LMS	FCC License Management System
MHz	Megahertz
NPT	National Periodic Test (EAS)
NRSC	National Radio Systems Committee
OPIF	Online Public Inspection File (deprecated term, see “PIF”)
PIF	Public Inspection File
RCAGL	Radiation Center Above Ground Level
RF	Radio Frequency
RMT	Required Monthly Test (EAS)
RPU	Remote Pickup Unit
RWT	Required Weekly Test (EAS)
SCA	Subsidiary Communications Authorization
STA	Special Temporary Authority
TBA	Time Brokerage Agreement
TPO	Transmitter Power Output
TSA	Terms of Station Authorization

TV

(Digital) Television Broadcast



APPENDIX II. GLOSSARY OF BROADCAST TERMS

- Amplitude Modulation (AM)**
A modulation technique used in electronic communication, most commonly for transmitting intelligible information or messages with a radio wave (RF).
- AM Broadcast Band**
535 kHz to 1705 kHz used for commercial and non-commercial radio broadcast.
- Antenna Proof**
See Proof of Performance Measurements
- Bandwidth**
The difference between the upper and lower frequencies in a continuous band of frequency spectrum that a radio signal occupies.
- CAP**
Common Alerting Protocol: a digital format for exchanging emergency alerts across various different communications pathways, including for broadcast, internet, and wireless distribution.
- Control Point**
A location at which a properly designated person(s) on duty may operate a broadcast transmission facility. Where such a control point is at a location other than where the transmitter is located, that position is equipped with suitable controls so that essential functions can be performed.
- Decibel (dB)**
Is a relative unit of measurement equal to one tenth of a bel (B). It expresses the ratio of two values of a power or root-power quantity on a logarithmic scale. When the reference value is specified and extends the term dB, a decibel becomes an absolute value. (example: 0 dBm = 1 milliwatt, 0 dBuV = 1 microvolt)
- EAS Operating Handbook**
A booklet that states in summary, the actions to be taken by station personnel upon receipt of emergency action notification, termination, or test messages.
- EAS Encoder**
Equipment capable of generating the EAS Protocol.
- EAS Decoder**
Equipment capable of receiving and decoding the EAS Protocol transmitted by other broadcast stations or government entities; or CAP messages as delivered via IPAWS over the internet.
- EAS Protocol**
An audio signal composed of a digital header, two-tone frequencies of 853 and 960 Hz (Attention Signal), emergency messages, Preamble and EAS end of message (EOM); which is transmitted by a station or a government entity of which such signal can activate EAS Decoders, and in turn alert the public. 47 CFR [§11.31\(a\)](#)
- EAS Test**
Non-emergency activations conducted periodically as specified in the FCC Rules by broadcast stations to ensure that their EAS equipment is functioning properly.
- Equipment Performance Measurements**
Measurements performed to determine the overall performance characteristics of a broadcast transmission system or broadcast equipment.
- Extension Metering**
A meter that has been extended from the point of measurement and used to provide indications of a sampled parameter of a broadcast station transmitting system. To be considered an extension meter and not a remote meter, it must be less than 100 feet from the transmitter and installed in the same facility as the transmitter.
- Field Strength**
A measurement of electric field intensity typically measured in millivolts per meter (mV/m) or in decibels relative to 1 microvolt per meter (dBu) or in decibels relative to 1 millivolt per meter (dBmV/m).

Frequency Modulation (FM)

A modulation technique in which the method of modulation is accomplished by encoding of information in a RF carrier wave by varying the instantaneous frequency of the wave.

FM Broadcast Band

87.9 to 107.9 MHz used for commercial and non-commercial radio broadcast.

IBOC

In Band On Channel - A hybrid method of transmitting digital radio and analog radio broadcast signals simultaneously on the same frequency. This term applies to both AM and FM hybrid digital transmission, each contained by their own standards.

IPAWS

Integrated Public Alert and Warning System - An architecture that unifies the United States' Emergency Alert System, National Warning System, Wireless Emergency Alerts, and NOAA Weather Radio, under a single platform enabling alerts to be aggregated over a network and distributed to the appropriate system for public broadcast and dissemination.

Joint Sales Agreement

An agreement between licensees that authorizes a station to sell advertising time on another station.

License Authorization

The License Authorization is the document issued to the Licensee by the FCC permitting operation of a Broadcast Station or a Broadcast Auxiliary Station after all construction work has been performed under the terms of the Construction Permit and to the satisfaction of the FCC. This document permits the Licensee to operate and contains the time and technical parameters authorized by the FCC for the stations' operations.

Local Marketing Agreement

Similar to a Time Brokerage Agreement. See Time Brokerage Agreement.

Main Studio

In the context of this document, the location where the Station Log is located. This is usually a location where the Chief Operator is located and is usually a business address. Note - The FCC eliminated the requirement to locate a Main Studio within the primary protected contour of the station in 2017.

NRSC

National Radio Standards Committee - An organization sponsored by the Consumer Technology Association (CTA) and the National Association of Broadcasters ([NAB](#)) for the main purpose of setting industry technical standards for radio broadcasting in the United States.

NRSC-1

An NRSC standard that sets forth pre-emphasis/deemphasis and Broadcast Audio Transmission Bandwidth Specifications.

NRSC-2

An NRSC standard that sets forth Emission Limitations for Analog AM Broadcast Transmission.

NRSC-5D

An NRSC standard that sets forth the system requirements for broadcasting digital audio and ancillary digital data signals over FM broadcast channels spaced 200 kHz apart that may contain analog frequency modulated signals.

Online Public Inspection File (OPIF)

Deprecated term. Now Public Inspection File (PIF)

Procedures and Schedules

Procedures and Schedules are required by the FCC Rules to document how and when certain actions are to be performed and under what schedule these actions should be done to assure compliance with FCC Rule Requirements. These should be reduced to writing. This document helps define the FCC requirement used in the FCC Rules of "as often as necessary".

Proof of Performance

See Equipment Performance Measurements.

Public Inspection File (PIF)

Required accessible documents as defined in [§73.3526](#) and [§73.3527](#), shall be made available to the public by all broadcast stations and new construction permit applicants. All operating broadcast stations are currently hosted online by the FCC, known as the Online Public Inspection File (OPIF). The documents shall be maintained by a licensed broadcast station, which contains documents pertaining to the station's licensing, ownership, and operation intended for review by the listening/viewing public.

Spurious Emissions

An emission on a frequency or frequencies which are outside the licensed parameters of a broadcast transmission system and at a level that may cause harmful interference.

Station Authorization

A document typically issued by the FCC that authorizes some action or operation to occur. Common authorizations may include a Construction Permit (CP), License, and Special Temporary Authority (STA), among others.

Station Identification

An announcement that shall be made at the beginning and ending of each period of operation, and hourly, as close to the hour as feasible at a natural break in programming. The Station Identification shall comply with the rules found at [§73.1201](#), [§74.882](#) and [§74.1283](#).

Station Log

include entries pertaining to equipment status, equipment calibration (as recommended within this document and other sources), the Emergency Alert System (EAS) and, when applicable, the recording of tower light outages.

Station Records

Required documents including but not limited to chief operator designations and required equipment performance measurements.

Terms of Station Authorization (TSA)

The Terms of Station Authorization consists of the License Authorization(s) supplemented by all its supporting documents (renewals, call sign changes, changes in ownership and any other items sent by the FCC to update the License Authorization). The TSA also includes Antenna Structure Registrations, Auxiliary Licenses, Translator and Booster Licenses, Broadcast Auxiliary Licenses, Special Temporary Authorizations and any other documents that impact the station's operation issued by the FCC.

Time Brokerage Agreement

Sale by a licensee of discrete blocks of airtime of a broadcast station to a buyer who then supplies the programming to fill that time, which may include commercial content.

Transmitter Power Output (TPO)

The radio frequency (RF) output power of a transmitter's final power amplifier that, along with the antenna system, produces the required Effective Radiated Power (ERP) of a given licensed broadcast station.

For all of the above definitions also see - [§73.681](#), [§73.6000](#), [§73.14](#), [§73.310](#), [§74.2](#), [§74.401](#), [§74.701](#), [§74.801](#) and [§74.1201](#)

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This Guide has not been approved or endorsed by the FCC.

This Guide should in no way be construed as legal advice or a legal opinion on any specific set of facts or circumstances. Therefore, you should consult with legal counsel concerning any specific set of facts or circumstances.

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APPENDIX III: HYPERLINKS REFERENCES

§1.4	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-1/subpart-A/subject-group-ECFR5cdb43ad1467198/section-1.4
§1.1307	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-1/subpart-I/section-1.1307
§1.1310	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-1/subpart-I/section-1.1310
§1.30000	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-1/subpart-BB
§1.30002	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-1/subpart-BB/section-1.30002
§1.30003	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-1/subpart-BB/section-1.30003
§11.11	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-A/section-11.11
§11.15	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-A/section-11.15
§11.31	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-B/section-11.31
§11.32	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-B/section-11.32
§11.33	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-B/section-11.33
§11.34	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-B/section-11.34
§11.41	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-C/section-11.41
§11.45	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-C/section-11.45
§11.46	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-C/section-11.46
§11.51	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-D/section-11.51
§11.52	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-D/section-11.52
§11.54	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-D/section-11.54

§11.55	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-D/section-11.55
§11.61	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-E/section-11.61
§11.35	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-11/subpart-B/section-11.35
§17.4	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-17/subpart-A/section-17.4
§17.47	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-17/subpart-C/section-17.47
§17.48	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-17/subpart-C/section-17.48
§17.49	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-17/subpart-C/section-17.49
§17.50	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-17/subpart-C/section-17.50
§17.5	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-17/subpart-A/section-17.5
§17.6	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-17/subpart-A/section-17.6
§17.7	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-17/subpart-B/section-17.7
§73.14	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.14
§73.44	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.44
§73.45	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.45
§73.49	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.49
§73.51	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.51
§73.53	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.53
§73.54	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.54
§73.61	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.61



§73.62	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.62
§73.68	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.68
§73.69	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.69
§73.99	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.99
§73.154	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.154
§73.155	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.155
§73.158	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.158
§73.189	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.189
§73.267	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-B/section-73.267
§73.293	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-B/section-73.293
§73.297	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-B/section-73.297
§73.310	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-B/section-73.310
§73.317	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-B/section-73.317
§73.403	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-C/section-73.403
§73.404	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-C/section-73.404
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§73.503	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-D/section-73.503
§73.51	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.51
§73.611	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.611



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§73.811	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-G/section-73.811
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§73.1201	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.1201
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§73.1400	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.1400
§73.1540	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-A/section-73.1540
§73.1545	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.1545
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§73.1800	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.1800
§73.1820	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.1820
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§73.1870	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.1870
§73.1940	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.1940



§73.1941	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.1941
§73.1943	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.1943
§73.1944	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.1944
§73.2080	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.2080
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§73.4165	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.4165



§73.4170	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.4170
§73.4210	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.4210
§73.4267	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.4267
§73.6000	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-J/section-73.6000
§73.6001	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-J/section-73.6001
§73.8000	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-L/section-73.8000
§73.1300	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.1300
§73.1665	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.1665
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§73.1820	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-H/section-73.1820
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§74.2	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-ECFR5c332fcbf4e5a4a/section-74.2
§74.401	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-D/section-74.401
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§74.750	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-G/section-74.750
§74.780	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-G/section-74.780
§74.781	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-G/section-74.781
§74.783	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-G/section-74.783
§74.784	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-G/section-74.784
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§74.801	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-H/section-74.801
§74.882	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-H/section-74.882
§74.1201	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-L/section-74.1201
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§74.1231	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-L/section-74.1231
§74.1232	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-L/section-74.1232
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§74.1283	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-L/section-74.1283
§74.1284	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-L/section-74.1284
§76.64	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-76/subpart-D/section-76.64
§76.1608	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-76/subpart-T/section-76.1608
§74 Subpart D	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-D
§74 Subpart E	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-74/subpart-E
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18USC1464	https://www.govinfo.gov/content/pkg/USCODE-2021-title18/pdf/USCODE-2021-title18-partI-chap71-sec1464.pdf
18USC1464	https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title18-section1464&num=0&edition=prelim
47USC303	https://uscode.house.gov/view.xhtml?req=granuleid:USC-2000-title47-section303a&num=0&edition=2000
47USC310	https://uscode.house.gov/view.xhtml?req=(title:47%20section:310%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section310)&f=treesort&edition=prelim&num=0&jumpTo=true
47USC315	https://uscode.house.gov/view.xhtml?req=(title:47%20section:315%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section315)&f=treesort&edition=prelim&num=0&jumpTo=true
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FCC 715/715A	https://www.fcc.gov/wireless/bureau-divisions/competition-infrastructure-policy-division/antenna-painting-lighting
FCC ARS Search	https://wireless2.fcc.gov/UlsApp/AsrSearch/asrRegistrationSearch.jsp
FCC ASR	https://www.fcc.gov/wireless/systems-utilities/antenna-structure-registration
FCC ASR Policy	https://www.fcc.gov/wireless/systems-utilities/antenna-structure-registration
FCC Audio	https://www.fcc.gov/media/radio/audio-division
FCC CDBS	https://licensing.fcc.gov/prod/cdbbs/pubacc/prod/app_sear.htm
FCC EAS	https://www.fcc.gov/emergency-alert-system
FCC EDOCS	https://www.fcc.gov/edocs
FCC EEO	https://www.fcc.gov/consumers/guides/eeo-rules-and-policies-radio-and-broadcast-and-non-broadcast-tv
FCC FM Model	https://www.fcc.gov/general/fm-model
FCC LMS	https://enterpriseefiling.fcc.gov/dataentry/public/tv/publicFacilitySearch.html
FCC Media	https://www.fcc.gov/media
FCC PSHS	https://www.fcc.gov/public-safety-and-homeland-security
FCC R&O 00-10	https://docs.fcc.gov/public/attachments/FCC-00-19A1.pdf
FCC The Public and Broadcasting	https://www.fcc.gov/media/radio/public-and-broadcasting
FCC Unattended Operation Policy	https://www.fcc.gov/media/radio/unattended-operation
FCC Video	https://www.fcc.gov/media/television/video-division

FCC WTB	https://www.fcc.gov/wireless/universal-licensing-system
FCC WTB Search	https://wireless2.fcc.gov/UlsApp/UlsSearch/searchLicense.jsp
FCC.GOV	https://www.fcc.gov/
https://transition.fcc.gov/eb/broadcast/sponsid.html	https://transition.fcc.gov/eb/broadcast/sponsid.html
IBFS	https://www.fcc.gov/general/international-bureau-filing-system
License ownership restrictions	https://uscode.house.gov/view.xhtml?req=granuleid:USC-1999-title47-section310&num=0&edition=1999
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Part 73 Subpart C Digital Audio Broadcast	https://www.ecfr.gov/current/title-47/chapter-I/subchapter-C/part-73/subpart-C
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Payola	https://www.fcc.gov/sites/default/files/payola-rules.pdf
Profanity	https://www.fcc.gov/sites/default/files/obscene_indecent_and_profane_broadcasts.pdf
SBE	https://sbe.org/
ULS	https://www.fcc.gov/wireless/universal-licensing-system