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Serving the broadcast industry since 1959

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AM AND FM RADIO STATION

AM/FM Pg. 1

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PUBLIC FILES SIMPLIFIED

RECENTLY A NUMBER OF CHANGES WERE MADE IN THE FCC REGULATIONS PERTAINING TO THE MAINTENANCE OF PUBLIC FILES. THE FOLLOWING UPDATES ALL OF THOSE CHANGES. THE ITEMS UNDERLINED IN **BOLD** SHOULD BE USED ON THE TABS OF EACH PUBLIC FILE FOLDER WITH THE FOLLOWING TEXT ATTACHED TO THE FRONT OF EACH FOLDER FOR FUTURE REFERENCE.

WELCOME TO OUR PUBLIC FILE

While not required by law, this "Welcome" folder contains copies of the information necessary to process any type of public file inquiry, i.e. in person, by telephone, fax, mail or e-mail. It is prepared to contain all the information necessary to properly handle any public file inquiry even in the absence of appropriate management. Completed copies of these information sheets are not to be retained as part of the file available to the public.

APPLICATIONS

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 Commission and which are open for public inspection at the FCC? This includes applications granted pursuant to a waiver. [See 73.3526(e)(2) or 73.3527(e)(2)]

AUTHORIZATION

AUTHORIZATION: Is a copy of the current FCC authorization (license) to construct or operate the station being maintained in the public file? [See 73.3526(e)(1) or 73.3527(e)(1)]

CITIZEN AGREEMENTS

CITIZEN AGREEMENTS: For commercial stations, are copies of all citizen agreements maintained in the file for the term of the agreement? [See 73.3526(e)(3)]

CONTOUR MAPS

CONTOUR MAPS: Is a copy of any service (coverage) contour maps, submitted with any application tendered for filing with the FCC, together with any other information in the application showing service contours and/or main studio and transmitter location in the file. [See 73.3526(e)(4) or 73.3527(e)(3)]

RETENTION OF CONTOUR MAPS: Are the station's contour maps retained for as long as they reflect current, accurate information regarding the station? [See 73.3526(e)(4) or 73.3527(e)(3)]

OWNERSHIP REPORTS

OWNERSHIP REPORTS: For station licensees who are not sole proprietorships, does the public file contain copies of annual ownership reports and supplemental ownership reports filed with the Commission, including all exhibits, letters, Articles of Incorporation and other documents associated with these filings? [See 73.3526(e)(5), 73.3527(e)(4) and 73.3615]

OWNERSHIP INFORMATION: For non-commercial stations, does the ownership information on file with the Commission reflect the current ownership (board members, officers, etc.) of this station? [See 73.3527(e)(4) and 73.3615(d, e & f)]

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), 73.3527(e)(4), 73.3615(a)(4)(i) and 73.3615(d)(3)]

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? [See 73.3526(e)(5) or 73.3527(e)(4)]

POLITICAL

POLITICAL: Does the licensee have a complete record of all requests for broadcast time made by or on behalf of candidates for public office, together with an appropriate notation showing the disposition made by the licensee of such requests, and the charges made, if any, if the request was granted? (Use NAB Fm Item 4046) [See 73.1943 and either 73.3526(e)(6) or 73.3527(e)(5)]

FREE POLITICAL TIME: If free time was provided for use by or on behalf of such candidates, has a record of the free time that was provided been placed into the file? [See 73.1943 and either 73.3626(e)(6) or 73.3527(e)(5)]

RETENTION OF POLITICAL RECORDS: Are these records retained for a period of two years? [See 73.3526(e)(6) or 73.3527(e)(5)]

NON-CANDIDATE/ISSUE ADVERTISEMENTS

This folder should include a completed NAB form PB-15 ISSUES (Item #4046A) for each request for this type of station time. While yet to be defined under FCC regulations, this item serves to indemnify stations who choose to carry or reject such advertising requests. The forms are available at nominal cost from the National Association of Broadcasters, 1771 N Street, NW, Washington, DC 20036-2891 or call 800-368-5644 or 202-429-5373.

EEO FILE

New rules became effective March 10, 2003. Records of activities undertaken prior to this date are not required. *Please note personal identification of employee applicants, current employees and employee evaluations are not required and should never be placed in this public file folder.*

For this Public File Folder the following items are to be maintained:

- Job Titles of all full-time hires;
- Name, address, contact person and phone number of each recruitment source, i.e. schools, broadcaster's associations, professional organizations etc. that have been used to fill each vacancy. These include those organizations entitled to automatic notifications.

- The Recruitment source that referred each full-time person hired;
- Total number of persons interviewed for each full-time vacancy;
- Number of persons interviewed referred by each recruitment source;
- A list and description of all outreach initiatives undertaken (job fairs, etc.) undertaken during the past year.

These items are to be retained until grant of the next renewal or license agreement.

(Stations are encouraged to obtain a primer on current <non public file> EEO/FCC requirements that involve initiatives, notifications, recruitment policies and other areas. One excellent such primer is available at www.wcsr.com entitled "EEO Regulations for Broadcasters - A Primer on Current FCC Requirements")

PUBLIC AND BROADCASTING

PUBLIC AND BROADCASTING: Does the station file have a copy of the most recent version of the manual entitled "The Public and Broadcasting" available in the file at all times? [See 73.3526(e)(8) or 73.3527(e)(7)]

LETTERS FROM THE PUBLIC

LETTERS FROM THE PUBLIC: For commercial stations, does the licensee retain all written comments and suggestions received from the public, including e-mail, regarding operation of their station unless the writer requested that the correspondence not be made public or the licensee felt that it must be excluded because of the nature of its content, such as a defamatory or obscene letter? E-Mail copies may be kept either on the computer or on paper. [See 73.1202 and 73.3526(e)(9)]

RETENTION OF LETTERS: For commercial stations, are all letters retained for three years from the date received? [See 73.3526(e)(9)]

INVESTIGATIVE MATERIAL

INVESTIGATIVE MATERIAL: Does the station have any material having a substantial bearing on a matter which is the subject of an FCC investigation or complaint to the FCC of which the licensee has been advised? [See 73.3526(e)(10) or 73.3527(11)]

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

ISSUES-PROGRAM LISTS

ISSUES-PROGRAM 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)(11)(i) or 73.3527(e)(8)]

FILED QUARTERLY: Was the issues-programs list filed by the tenth day of the succeeding calendar quarter (e.g. January 10, April 10, July 10, & October 10)? [See 73.3526(e)(11)(i) or 73.3527(e)(8)]

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)(11)(i) or 73.3527(e)(8)]

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)(11)(i) or 73.3527(e)(8)]

RETENTION OF ISSUES-PROGRAMS LISTS: Are the issues-programs lists retained for the term of the license? [See 73.3526(e)(11) or 73.3527(e)(8)]

DONOR LISTS

DONOR LISTS: For non-commercial stations, does the licensee maintain a list of donors supporting specific programs? [See 73.3527(e)(9)]

RETENTION OF DONOR LISTS: For non-commercial stations, does the licensee retain such donor list(s) for a period of two years? [See 73.3527(e)(9)]

TIME BROKERAGE AGREEMENTS

TIME BROKERAGE AGREEMENTS: For commercial stations, does the public file contain a copy of every agreement or contract involving time brokerage or the licensee's station, or of another station by the licensee? Confidential or proprietary information may be removed [See 73.3526(e)(14)]

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

LOCAL ANNOUNCEMENTS

LOCAL ANNOUNCEMENTS: 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) and 73.3580(h)]

RETENTION OF LOCAL ANNOUNCEMENTS: Was the statement certifying compliance with 73.3580(h) retained until final action is taken on the application to which it refers to? [See 73.3526(e)(13) or 73.3527(e)(10)]

Note: The following (non-mandatory) item is suggested for presentation to any party visiting the station to view the public file. It should be helpful now that mail and telephone requests are also required to be fulfilled. It is suggested to be used as the first file folder with several copies reproduced on the station letterhead. A charge should be made and collected in advance for each public file page copy requested to prevent outrageous future demands for copies without charge.

Welcome to our Broadcast Operation and our library of Public Files.

These files are available for review and for copying at any time during normal business hours. A staff member will be pleased to assist you in locating any item of interest. To prevent mis-filing only one file is made available at a time. None of the items in any file may be removed, however, you may have copies made for 25¢ per page. Please note the items you wish copied in the space below.

We will appreciate your care in the handling and proper re-filing of these important documents following your review.

This station operates in full compliance of the rules and regulations of the United States Federal Communications Commission and is proud to serve the public interest, convenience and necessity. We welcome your comments and suggestions. Thank you for your interest.

The Station Management and Staff

Item(s) I wish to order copies of include:

- 1. _____ # of pages: _____
- 2. _____ # of pages: _____
- 3. _____ # of pages: _____

Total pages _____ @ 25¢/page = _____ cost
(Payable in advance of delivery)
(There is no charge for postage or handling.)

Please mail to:

Name: _____ Address: _____

City: _____ State: _____ Zip: _____

Telephone: _____

This item has been produced by the staff of K.J. Benner & Associates based upon substantial experience with numerous state broadcaster association's Alternative-FCC Inspection programs following over 4000 such inspections conducted by Mr. Benner or under his supervision. It is a good faith effort to simplify broadcast station Federal Communications Commission public file compliance. While every effort has been made to determine it's update and accuracy, K.J. Benner and Associates cannot be held liable for any inadvertent omission or regulatory modification since it's development. This item is not copywrited and maybe reproduced at will. Please consult legal counsel for professional advice