

ABC Radio Network

Capital Cities/ABC, Inc.
825 7th Ave., 4th fl.
New York NY 10019
212-456-5200 Fax: 212-456-5397

13725 Montfort Dr.
Dallas TX 75240
214-991-9200 Fax: 214-991-1071

ABC Radio Network

Programming type: News, information, sports

ABC Talkradio

Programming type: Weekend talk radio

ClassicRock

Programming type: Classic Rock

Country Coast to Coast

Programming type: Country

ESPN Radio Network

Programming type: Sports and sports talk

Hot Adult Contemporary

Programming type: Hot AC

MR-35

Programming type: Modern Rock

Pure Gold

Programming type: Oldies

Real Country

Programming type: Classic county

StarStation

Programming type: Adult contemporary

Stardust

Programming type: Adult standards

The Touch

Programming type: Urban AC

Urban Gold

Programming type: R&B oldies

Z-Rock

Programming type: Rock

After Midnite Entertainment

3575 Cahuenga Boulevard, Suite 500
Los Angeles CA 90068-1346
213-851-7770 Fax: 213-851-1872
Programming type: Country

American Entertainment Network

1900 19th St. #A
Bakersfield CA 93301
805-324-5549 Fax: 619-754-3344
Programming type: Talk

American Urban Radio Networks

463 Seventh Ave. 6th fl.
New York NY 10018
212-714-1000 Fax: 212-714-2349
Programming type: News, information, talk

Associated Press Broadcast Services

AP Radio Network

1825 K Street Northwest, Suite 615
Washington DC 20006-1253
202-736-1100
Programming type: News, information

Bailey Broadcasting Services

3151 Cahuenga Blvd. W., Ste. 200
Los Angeles CA 90068-1768
213-969-0011 Fax: 213-969-8474
Programming type: Features

Bloomberg Business News

Bloomberg Information Radio
499 Park Avenue
New York NY 10022
212-318-2000 Fax: 212-318-2080
Programming type: News

Branson Music Network

Branson Country

Box 6610
Branson MO 65616
417-335-2261 Fax: 417-335-2377
Programming type: Country

Broadbank Burbcasting Corporation

The Gary Burbank Show

1111 St. Gregory Street
Cincinnati OH 45202
513-241-9597
Programming type: Talk

Broadcast Programming

2211 Fifth Ave.
Seattle WA 98121
206-335-5064 Fax: 206-441-6582
Programming type: Music formats

Business News Network

99 Canal Center Plaza, Suite 220
Alexandria VA 22314
703-683-8488 Fax: 703-683-1496
Programming type: Business news, talk

CBS Radio Network

CBS, Inc.

51 West 52nd Street
New York NY 10019
212-975-6085 Fax: 212-975-3515
Programming type: News, information, sports, talk

CBS Spectrum Radio Network

Programming type: Features

RadioRadio

Programming type: News, features

CHUM Satellite Network

1331 Yonge Street
Toronto ON M4T 1Y1
416-925-6666 Fax: 416-926-4042
Programming type: Talk, sports, news

CNBC Business Radio

CNBC, Westwood One Networks

1675 Broadway, 17th Floor
New York NY 10019
212-641-2000 Fax: 212-247-0393
Programming type: Business news & information
Marketed by Westwood One Networks

CRC Radio Network

Heftel Broadcasting Corp.

Cadena Radio Centro

CNN Radio Noticias

1645 N. Vine St.
Hollywood CA 90028
213-463-3800 Fax: 213-463-7724
Programming type: Spanish news, information, music

Chancellor Broadcasting Company

Talk Radio Network

744 E Pine Street
Central Point OR 97502
503-664-8829 Fax: 503-664-8261
Programming type: Talk

SUCCESS

stress

with

50's, 60's & 70's Oldies



StarStation

Adult Contemporary

Rock Alternative



URBAN GOLD

Urban Oldies

Contemporary Country



Traditional Country

Urban Adult Contemporary



Hot AC

Young AC

Adult Standards

STARDUST



Classic AOR

ABC RADIO
24-HOUR FORMATS

East Affiliation
212-456-1777

West Affiliation
214-991-9200

people
are listening



ABC RADIO NETWORKS

NETWORKS/PROGRAMMING

Children's Media Network

KidStar Interactive Media
1334 First Avenue, Suite 150
Seattle WA 98101-2003
206-382-1250 Fax: 206-624-7956
Programming type: Pre-Teen

Children's Broadcasting Corp.

Children's Satellite Network
Radio Aahs
724 1st Street North
Minneapolis MN 55401
612-338-3300 Fax: 612-338-4318
Programming type: Pre-Teen
Marketed by ABC Radio Networks

Christian Science Monitor

Christian Science Publishing
Christian Science Monitor Radio Network
One Norway Street
Boston MA 02101
617-450-2072
Programming type: News and information
Marketed by Public Radio International

DCM Group

America the Beautiful
1320 Old Chain Bridge Road, Suite 220
McLean VA 22101
703-883-1355 Fax: 703-883-1850
Programming type: Talk

Don Buchwald Associates

The Howard Stern Show
10 East 44th Street
New York NY 10017
212-867-1070 Fax: 212-867-2434
Programming type: Talk

EFM Media Management

Rush Limbaugh, Dean Edell
366 Madison Ave. 7th fl.
New York NY 10017
212-661-7500 Fax: 212-661-7945
Programming type: Talk

Entertainment Radio Networks

23720 Malibu Rd.
Malibu CA 90265
310-456-7879 Fax: 310-456-0611
Programming type: Talk, Information, Music

Far West Communications

True Country
3610 1/2 Foothill Blvd.
La Crescenta CA 91214
818-248-2400 Fax: 818-248-2596
Programming type: Country

Global Satellite Network

14958 Ventura Boulevard, Suite 300
Sherman Oaks CA 91403
818-906-1888 Fax: 818-906-9736
Programming type: Music, features

J4 Broadcasting Network

Classic Oldies Network
3540 Reading Road
Cincinnati OH 45229
513-281-7180
Programming type: R&B Oldies

Jefferson Pilot

Jefferson Pilot Radio Network
The Bob and Sheri Show
One Julian Place
Charlotte NC 28208
704-374-3500 Fax: 704-374-3884
Programming type: Talk

Jones Satellite Network

Jones Intercable
9697 East Mineral Avenue
Englewood CO 80112
800-876-3303 Fax: 303-799-0966
Adult Choice
Programming type: Adult contemporary
CD Country
Programming type: Hot country
FM Lite
Programming type: Smooth Jazz
Good Time Oldies
Programming type: Oldies
Modern Rock
Programming type: Modern Rock
Soft Hits
Programming type: Soft AC
The Word in Music
Programming type: Contemporary Christian
U. S. Country
Programming type: Country
Z-Spanish Network
Programming type: Regional Mexican

Lee Bailey Communications

Bailey Broadcasting Services
3151 Cahuenga Bl. West #200
Los Angeles CA 90068
213-969-0011 Fax: 213-969-8474
Programming type: Urban

LifeTalk Broadcasting Foundation, Inc.

LifeTalk Radio Network
402 E. Yakima Ave. Ste 1320
Yakima WA 98901
509-248-8255 Fax: 509-248-8927
Programming type: Religious

Major Networks

101 W. Grand Ave., Ste. 600
Chicago IL 60610
312-755-1300 Fax: 312-803-2772
Major Sports
Programming type: Sports
Major Talk
Programming type: Talk

Metro Networks

Metro Traffic Control

2700 Post Oak Blvd., Ste. 1400
Houston TX 77056
713-621-2800 Fax: 713-622-7045
Programming type: Traffic, news, sports, weather

Moody Bible Institute

Moody Broadcasting Network

820 North LaSalle Drive
Chicago IL 60610
312-329-4433 Fax: 312-329-4468
Programming type: Religion

Morningstar Radio Network

402 BNA Dr., Bldg. 100, Ste. 207
Nashville TN 37217
615-367-2210 Fax: 615-367-0758

High Country

Programming type: Christian Country

Today's Christian Music

Programming type: Contemporary Christian

Morris International

Nascar Country

301 East Boulevard
Charlotte NC 28203
704-376-0075 Fax: 704-376-2003
Programming type: Country

Motor Racing Network

NASCAR Racing Circuit

Box 2888
Daytona Beach FL 32115
904-254-6760 Fax: 904-254-6716
Programming type: Racing news, talk, coverage

Music Channel One

280 N. College, Ste. 125
Fayetteville AR 72701
501-521-5128 Fax: 501-521-4968
Programming type: CHR

Musical Starstreams

Box 1989
Sedona AZ 86339
602-204-1989 Fax: 602-204-1990
Programming type: New AC

Nashville Record Review

2644 McGavock Pike
Nashville TN 37214
615-871-6725 Fax: 615-871-6778
Programming type: Country
Marketed by Group W

National Public Radio

635 Massachusetts Ave., N.W.
Washington DC 20001
202-414-2000 Fax: 202-822-2329
Programming type: Information, music, variety

Network Broadcasting Associates, Inc.

Hot Tub Radio Party

1045 East University Drive
Mesa AZ 85203
516-432-8117 Fax: 516-484-1242
Programming type: Talk

Olympia Broadcasting Network

22 North Euclid
St. Louis MO 63108
314-361-2000 Fax: 314-361-2393
Programming type: Features

One-On-One Sports Radio

1935 Techny Road, Suite 18
Northbrook IL 60062
708-509-1661 Fax: 708-509-1677
Programming type: Sports talk and coverage

Pelmorex Radio Network

186 Robert Speck Parkway, Suite 200
Mississauga ON L4Z 3G1
905-568-9511 Fax: 905-566-7012
Programming type: Rock/AC & Country

People's Radio Network

Three River St.
White Springs FL 32096-0456
800-397-8255 Fax: 904-397-4149
Programming type: News, talk, information

Premiere Radio Networks

15260 Ventura Blvd., Ste. 500
Sherman Oaks CA 91403
818-377-5300 Fax: 818-377-5333
Programming type: Information, music, entertainment

Public Radio International

100 North 6th Street, Suite 900A
Minneapolis MN 55403
612-338-5000 Fax: 612-330-9260
Programming: news features long form
Programming type: Information, music, variety

Reach Satellite Network

Box 2840
Boone NC 28607
800-999-7234 Fax: 704-262-3776
Programming type: Southern gospel

Rocky Mountain Radio Company L.L.C.

Box 5559
Avon CO 81620
970-949-0909 Fax: 970-949-9266
Radio One - Go Country!
Programming type: Country
Radio One - New Rock: Alternative
Programming type: New Rock

SBI Broadcasting International

The Dr. Laura Show
610 S. Ardmore Avenue
Los Angeles CA 90005
213-427-1470 Fax: 213-487-6678
Programming type: Talk

SJS Entertainment

116 27th St., 11th Floor
New York NY 10016
212-679-3200 Fax: 212-679-3310
Programming type: Urban, country, rock

NETWORKS/PROGRAMMING

SW Networks

1370 Avenue of the Americas
New York NY 10019
212-833-5400 Fax: 212-833-4994
Programming type: Music, Information
Classic FM
Programming type: Classical
Smooth FM
Programming type: Smooth Jazz

Salem Radio Networks

Salem Communications
545 E. John Carpenter Freeway, Suite 450
Irving TX 75062
214-831-1920 Fax: 214-831-8626
Programming type: Religion, talk
Standard News
Programming type: News, Information

Secret Communications

Bob and Tom Show
6161 Fall Creek Rd.
Indianapolis IN 46220
317-257-7565
Programming type: Talk

Shadow Broadcast Services

555 East City Line Avenue
Bala Cynwyd PA 19004
610-667-4000 Fax: 610-660-0744
Programming type: Traffic, news and sports

Skylight Radio Network

Northwestern College Radio
3003 Snelling Ave. N.
St. Paul MN 55133
612-631-5000 Fax: 612-631-5010
Programming type: Gospel

Sports Byline

Champion Productions
300 Broadway, Ste. B
San Francisco CA 94133
415-434-8300 Fax: 415-391-2569
Programming type: Sports talk

Sports Radio Partnership, Ltd.

Prime Sports Radio
100 East Royal Lane, Suite 100
Irving TX 75039
214-502-4500 Fax: 214-402-4505
Programming type: Sports information, talk

SportsFan Radio Network

10 Harrison St., Suite 205
Seattle WA 98109
206-285-5055 Fax: 206-285-6052
Programming type: Sports talk

Superadio Networks

1671 Worcester Road, Ste. 209
Framingham MA 01701
508-626-2000 Fax: 508-620-0733
All Night Cafe
Programming type: Rock
Open House Party
Programming type: CHR

TFC Radio Network

Toccoa Falls College
Box 780
Toccoa Falls GA 30598-0780
800-251-8326 Fax: 706-886-0690
Programming type: Religious

Talk America Radio Network

500 West Cummings Park
Woburn MA 01801
617-937-9390 Fax: 617-938-3740
Programming type: Talk

Tribune Broadcasting Company

435 North Michigan Avenue, Suite 1900
Chicago IL 60611
312-222-3342 Fax: 312-222-4876
Tribune Radio Networks
Programming type: Farm
Interstate Radio Network
Programming type: Truck

USA Radio Network

2290 Springlake Road, Suite 107
Dallas TX 75234
214-484-3900 Fax: 214-241-6826
Programming type: News, talk, information

United Press International

UPI Radio Network
1400 Eye Street N.W., 9th Floor
Washington DC 20005
202-898-8111 Fax: 202-898-8124
Programming type: News, information

United Stations Radio Networks

25 W. 45th St., 11th fl.
New York NY 10036-4902
212-869-1111 Fax: 212-869-1115
Programming type: Entertainment, music

WFMT Radio Networks

WTTW, Inc.
Beethoven Satellite Network
303 East Wacker Drive, Suite 800
Chicago IL 60601
312-565-5008 Fax: 312-565-5169
Programming type: Classical

WOR Radio Network

Buckley Broadcasting
1440 Broadway
New York NY 10014
212-642-4533 Fax: 212-642-4486
Programming type: Talk

Wall Street Journal Radio Network

Dow Jones and Company
Dow Jones Report
200 Liberty Street, 14th Floor
New York NY 10281
212-416-2380 Fax: 212-416-4195
Programming type: Business news

Westwood One

Westwood One Entertainment

Westwood One Radio Networks
1675 Broadway, 17th Floor
New York NY 10019
212-641-2000 Fax: 212-247-0393

9540 Washington Blvd.
Culver City CA 90121
310-204-5000 Fax: 310-840-4052

1755 South Jefferson Davis Highway
Arlington VA 22202
703-413-8300 Fax: 703-413-8445

25060 West Avenue Stanford, Ste. 100
Valencia CA 91355
805-294-9000 Fax: 805-294-9380

Westwood One Entertainment

Programming type: Talk, music and sports

Westwood One Radio Networks**70's Oldies**

Programming type: Oldies

Adult Rock 'n' Roll

Programming type: Classic hits

Adult Standards

Programming type: Adult standards

Bright Adult Contemporary

Programming type: Adult contemporary

CNN Headline News

Programming type: News format

CNN News

Programming type: News

Mutual News

Programming type: News, information, sports

NBC Radio Network

Programming type: News, information, sports

Oldies Channel

Programming type: Oldies

Soft AC

Programming type: Soft AC

The Source

Programming type: Information

Country

Programming type: Country

Westwood One News

Programming type: News, information

World Radio Network

Spanish Christian Satellite Network

Box 3333
McAllen TX 78502-3333
210-787-9700 Fax: 210-787-9700
Programming type: Spanish Religious

Full-Time Satellite Delivered Formats

<u>Adult Contemporary</u>		
ABC	StarStation	current/oldies mix
ABC	Young AC	hot AC
Jones	Adult Choice	current/oldies mix
Westwood	Bright AC	current/oldies mix

<u>Oldies</u>		
ABC	Pure Gold	60's & 70's
Jones	Good Time Oldies	60's & 70's
Westwood	OldiesChannel	60's & 70's
Westwood	70's Oldies	70's pop & rock hits

<u>Adult Standards</u>		
ABC	Stardust	40's to 80's
Music of Your Life		40's to 80's
Westwood		50's to 80's

<u>R&B Oldies</u>		
ABC	Urban Gold	oldies

<u>Business News</u>		
Business News Network		business news & talk

<u>Religion</u>		
Jones	The Word in Music	contemporary Christian
Morningstar		contemporary Christian
Morningstar	High Country	Christian country
Moody Broadcasting Network		variety
Reach		southern gospel
Skylight		contemporary Christian

<u>CHR</u>		
Music Channel One		current

<u>Children's Programming</u>		
KidStar		music and programs
Radio Aahs		music and programs

<u>Rock</u>		
ABC	Z-Rock	new rock/alternative
ABC	MR-35	adult modern rock
Jones		adult modern rock
Radio One		new rock/alternative

<u>Classic Rock</u>		
ABC	Classic Rock	classic rock
Westwood	Adult Rock N' Roll	classic hits

<u>Smooth Jazz</u>		
Jones	FM Lite	instrumental/vocal
SW	Smooth FM	instrumental/vocal

<u>Classical</u>		
SW	Classic FM	hit-based

<u>Country</u>		
ABC	Coast to Coast	current/oldies mix
ABC	Real Country	oldies/current mix
Branson	Branson Country	current/oldies mix
Jones	CD Country	current
Jones	U.S. Country	current/oldies mix
Radio One	Go Country	current/oldies mix
Westwood	Country	current/oldies mix
Westwood	Hot Country	current

<u>Soft Adult Contemporary</u>		
Jones	Soft Hits	oldies/current mix
Westwood		oldies/current mix

<u>Spanish</u>		
Jones	Z-Spanish	Spanish-reg. Mexican

<u>Sports</u>		
One-on-One Sports		sports talk shows
Prime Sports		sports news & talk

<u>News</u>		
AP	All News Radio	custom
Bloomberg		custom
Westwood	CNN Headline News	30 min. news segments

<u>Talk</u>		
PeoplesNetwork		news & talk shows
Talk America		talk shows

<u>Urban AC</u>		
ABC	The Touch	current/oldies mix

FCC Procedures and Overview

by Gregg P. Skall

Gregg Skall is a communications lawyer with the firm of Pepper & Corazzini, L.L.P., in Washington, DC. He frequently represents parties before the Commission and the Congress to obtain desired policy objectives. In 1984, the National Journal recognized him as one of the leading radio spectrum lobbyists in Washington. He writes and speaks on topics of Federal Communications Commission administrative process, electronic mass media, and telecommunications. He may be reached at (202) 296-0600.

APPLICATIONS AND LICENSING PROCEDURES

The Communications Act of 1934 requires that a radio station be licensed by the FCC before it commences broadcasting. There are two ways to obtain such a license, both of which require submitting an application to the FCC. The first method is to apply for a construction permit to build a new station. Often, there is significant competition for the initial grant of such a permit,¹ but once it has been issued and construction properly completed, the issuance of a license is usually automatic. The second method of obtaining a license is to purchase an existing station and seek authority from the FCC to assign the license to the purchaser. FCC authorization of the ownership change is required, and approval must be obtained before the purchase is consummated.

The Communications Act requires the FCC to observe certain procedures in these licensing activities. First, an application for authorization to build or buy a station must be filed. Then, the FCC must issue a public notice announcing the filing. The FCC cannot grant an application until 30 days have passed from the date this notice is published. The Act also requires that the party filing the application give local notice in the community where a station is proposed or, in the case of an existing station, where it is currently operating.

Before an application can be granted, the FCC must find that the grant will serve the public interest, convenience, and necessity. One of the matters it considers is formal petitions to deny, or informal objections challenging the grant of the application. These petitions and objections must be filed within the 30 day period following the FCC's public notice of the application's filing. If such petitions or objections are filed, the FCC must determine whether they raise a substantial and material question of fact or whether granting the application would serve the public interest. If such questions are raised, they must be resolved before an application can be granted.

If questions raised cannot be readily resolved, an evidentiary hearing, similar to a trial in a civil suit, is the procedure used to explore and finally resolve such questions. At such a hearing, evidence is collected and the burden is placed on the applicant to prove that the public interest would be served by grant of its application. If an applicant fails to produce sufficient evidence to meet this burden, its application will either be dismissed or denied.

In contrast, if no petitions or objections are filed, and the Commission finds no other problems, an application can be granted as soon as the 30-day public comment period has passed.

Similar procedures are also used when the FCC is asked to grant various other applications. Since a radio license is only granted for a limited seven year period, a licensee must apply for renewal of its license. Renewal applications, like initial licensing applications, are subject to public petitions and informal objections — but for a period of several months rather than 30 days.

Another kind of application is one by which a licensee of an existing station seeks a construction permit to make a major change to its station. Among other things, the Commission considers the change in an AM station's community of license or frequency to be a major change. For AM stations, major changes can also include increases in power. For non-commercial FM stations, they include significant (over 50%) changes in the area covered by the station's signal. Whenever such a change is proposed, the same public notice procedures and 30-day public comment period required for initial applications must be observed.

Some applications are considered minor in nature and are therefore not subject to a 30 day public comment period before they can be granted. These include applications for insignificant modifications to existing facilities, primarily those that cannot affect the station's frequency or its community of license. Another example is *pro forma* ownership changes, such as partnerships becoming corporations, or involuntary transfers of control in bankruptcy or situations involving the appointment of a receiver. Although an FCC public notice of the filing of such applications is still required, and informal objections from the public may still be filed, there is no required waiting period before these applications can be granted.

REGULATORY FEES

Pursuant to statutory authority, the Commission collects from broadcasters annual regulatory fees.

Amount of Fees

The Commission's schedule of fees was initially proposed by Congress, but may be modified each year. The amount of radio station fees are based upon the class of the station. Fees must be filed with the FCC's Form 159, on the date announced by FCC Public Notice.

Application Fees

The Commission also charges fees for the filing and processing of applications. A schedule of fees is available from the Commission or from the author of this article.

FCC PROCEDURES

OWNERSHIP RULES

Radio Ownership -- The Communications Act of 1996 eliminates the limit upon the number of stations that can be under common ownership or control nationally. Local ownership rules have been substantially relaxed according to market size (which continue to be measured by commercial contour overlap) to permit the following:

- in markets of 14 or fewer stations: up to 5 total (but no more than half of the stations in the market) and no more than 3 in the same service (AM or FM);
- 15 to 29 stations: up to 6 total, 4 in the same service;
- 30 to 44 stations: up to 7 total, 4 in the same service;
- over 45 stations: up to 8 total, 5 in the same service.

The Act authorizes the Commission to override these limits if it determines that the result would be an increase in the number of stations in operation.

National Radio and TV Ownership - The 1996 Act eliminated all limitations upon the number of broadcast stations that a person or entity may directly or indirectly own, operate or control on a national basis. The only remaining restriction limits the national audience reach for commonly-owned, -operated or -controlled television stations to 35 percent. The Commission has eliminated Section 73.3555(e)(1) of its rules and has revised Section 73.3555(e)(2) accordingly.

Alien Control -- The act also modified the old standard of alien ownership found at Section 310(b) of the Commission's Act by removing the restrictions on licensee or parent corporations having foreign officers or directors.

Joint Ventures and Simulcasting

A "time brokerage arrangement" for more than 15% of the brokered stations' broadcast hours per week is an attributable ownership interest. Further, stations in the same service whose overlap area constitutes more than 50% of either station's principal community contour may not simulcast for more than 25% of either stations' broadcast time.

The FCC defines time brokerage as the sale of discreet blocks of time to a party who both supplies the programming to fill that time and sells the commercial spot announcements in it. It has suggested that time brokerage agreements may provide for liquidated damages upon termination, but that excessive liquidated damages or an unreasonably lengthy term could raise questions concerning a licensee's meaningful control over its station. By its "main studio rule", brokered stations are required to maintain the presence of at least one full-time managerial and one staff person at the brokered station's main studio during regular business hours. (See following section on Main Studio Staffing.)

All time brokerage agreements, sometimes also called Local Marketing Agreements (LMAs), must be reduced to writing and included in the public inspection files of both the brokering and brokered stations for the term of the contract, although confidential or proprietary information may be redacted. Time brokerage agreements which qualify as an attributable interest must both be filed with the FCC within 30 days of execution and be included by the brokering station in its annual ownership report. The FCC filing must include a certification that the arrangement complies with the Commission's ownership rules. Should a brokering station purchase the brokered station, the 25% audience share limit will be tested at the time of acquisition, not when the time brokerage agreement began.

MAIN STUDIO STAFFING

In 1991, the Commission held in *Jones Eastern of the Outer Banks, Inc.* that, where a station located its primary studio outside the 3.16 mV/m contour, it must nevertheless maintain a main studio within that contour staffed by two full-time employees, one of whom must be supervisory (or managerial).

The FCC considers positions that will constitute a "meaningful managerial presence" at the main studio to include: president or other corporate officer; general manager; station manager; program director; sales manager; chief engineer with managerial duties; news director; personnel manager; facilities manager; operations manager; production manager; promotion manager; research director; controller and chief accountant. It is job duties rather than titles that are considered.

The FCC does not require these management persons to be "chained to their desks" during all business hours. However, they must report to work at the main studio on a daily basis and spend a substantial amount of time there, using the main studio as a "home base."

Non-managerial main studio staff may take on responsibilities for another business outside the studio so long as the main studio is attended by some station employee during all normal business hours. Caution: While this is a possibility, such an arrangement should be reserved for situations where the parties agree to maintain **EXTENSIVE** records regarding the actual time and duties devoted to each employer by the employee.

EEO ENFORCEMENT POLICIES

On February 1, 1994, the Commission announced and implemented a new equal employment opportunity enforcement procedure. The new policy statement refocused FCC EEO enforcement upon recruitment and the relative presence of minorities in interview and applicant pools.

Although the monetary forfeiture aspect of the policy has been suspended as a result of an action of the Court of Appeals for the District of Columbia, the standards are still being applied as informal policy by the Commission staff. A licensee's failure to demonstrate that it has recruited so as to attract an adequate pool of minorities or female

candidates for at least two-thirds (66%) of its staff vacancies during the previous license term can lead to monetary forfeitures ranging into the tens of thousands of dollars and possible reporting conditions or short term renewals. In one case, a license renewal was designated for hearing on issues that could lead to the loss of the license. It is the licensee's burden to demonstrate that it has met this threshold. Penalties can be triggered by inadequate performance or by a failure to document activities with adequate records.

The Commission considers certain factors to be evidence of egregious misconduct. These include a failure to attract minority or female candidate for at least one-third (33%) of the license term vacancies, a large number of hiring opportunities relative to staff size, a large pool of minorities in the relevant labor force, a history of previous EEO shortfalls, and EEO lapses with respect to minorities and women.

Factors favoring the licensee that would result in either a lower fine or a full-time (rather than a short-term) renewal include hiring of minorities above half or full parity levels (compared to their presence in the local workforce) on a consistent basis, a low number of hiring opportunities, and a low percentage of minorities in the relevant population. The Commission also holds out financial inability to pay as a possible downward adjustment. Finally, the Commission will permit a downward adjustment for a stand-alone station in an Arbitron 200+ market.

It is important then to maintain extensive records of hiring activities for each broadcast station. Special records should be maintained regarding efforts to attract minorities and the sources used for this purpose. Records should also be maintained as to the number of minorities in job applicant and interview pools.

Pepper & Corazzini has developed an EEO primer responsive to the Commission's new EEO program. That pamphlet is available upon request to the author of this article.

LICENSING

Term -- The radio standard license terms is 8 years, subject to short-term renewal sanctions where appropriate. A license is to terminate automatically if a station is silent for one year.

Procedures -- The Act prescribes a renewal procedure that precludes competing applications. A renewal application must be granted if the FCC finds (a) that the station has served the public interest, (b) the licensee has not committed any serious violations of the Communications Act or FCC rules, and (c) other violations of the Act or rules, taken together, would not constitute a pattern of abuse. (Although it would seem that this procedure perpetuates the current strong presumption of renewal expectancy, the vagueness of the first standard may afford the Commission considerable flexibility.) If the standards are not met, a renewal application may be denied after hearing or granted subject to terms and conditions. Only after denying renewal may the Commission accept applications for the forfeited facilities. These new procedures apply retroactively to all renewal applications filed after May 1, 1995.

Applications -- The Act specifically bars the Commission from requiring renewal applicants to file information previously provided or which is not directly material to the renewal.

FCC COMPLAINT AND ENFORCEMENT PROCEDURES

There are several types of special procedures and rules which require broadcaster attention with respect to FCC enforcement procedures. They include procedures for FCC field inspections, for public complaints and objections, for station forfeitures or fines, for rule making, for *ex parte* contacts by members of the public with the FCC and for required misconduct reports.

Informal Complaints Anyone may file a complaint with the FCC concerning the operation of the station. If such complaints contain significant allegations, the FCC customarily forwards the complaint to the licensee for comment and explanation. Under this procedure, the licensee is given a specific amount of time to respond. The FCC then evaluates whether any action is necessary and issues a letter informing both the complainant and the licensee of its decision.

Formal Complaints The FCC also considers more formal complaints against the licensee. These complaints often take the form of a legal petition requesting that the FCC take specific action. Among the most common of these are petitions to deny an application pending before the FCC. Petitions may also be filed independently of the application process. Consequently, a licensee should be wary of such filings at all times.

Petitions often allege that the licensee has violated a federal law or policy. The FCC requires petitions to contain specific facts to support their allegations. Once a petition is filed, a licensee has a limited period of time to submit a response or "opposition" to the petition. This is important to remember since, unlike informal complaint procedures, the FCC does not inform a licensee when its opposition is due. Unless the licensee submits an opposition on its own initiative, it may be completely precluded from responding to the petition at all.

If a licensee submits an opposition to a petition, FCC procedures generally allow the party filing the petition to submit a reply to the opposition. Thereafter, no further pleadings are allowed. The FCC will then make a decision about whether further action is warranted. If it decides no action is necessary, it will either dismiss or deny the petition. If it believes further inquiry is required, it will usually designate the matter for a formal evidentiary hearing or initiate an investigation.

Field Inspections As a result of a complaint, a petition to deny, a licensee's failure to file some required information, or a random decision by FCC staff, a station can receive an unannounced field inspection by the agency. Such investigations or inspections may include anything from a review of the station's public inspection file to an evaluation of the performance of a station's transmitter. Such inspections are frequently held after a station has completed significant new construction, to determine whether it is operating as authorized.

Most inspections are simply a routine investigation by FCC staff to make sure a licensee is operating its station in conformance with FCC rules. Every licensee must eventually endure such an inspection, so they should not be viewed with alarm. Generally, an FCC field inspector has a right to inspect every aspect of a broadcast station's operation and can review all documents related to the operation. Remember, however, that FCC rules specify only certain documents must be made available to the field inspector.

FCC PROCEDURES

While a member of the public has a right to see the station's public inspection file, only an FCC field inspector has a right to see anything more. Consequently, before providing documents or information not contained in the public inspection file, the licensee has a right to see positive identification indicating that the person requesting the information is an FCC official.

Forfeiture Proceedings If as a result of a field inspection or a complaint, a violation of FCC rules is found, the licensee involved may be subject to a forfeiture proceeding. A forfeiture is a monetary fine. A "forfeiture proceeding" determines how serious the violation is and how large a fine, if any, should be imposed. In a forfeiture proceeding, an official Notice of Violation (FCC Form 793) is mailed to the station. This notice indicates the particulars of the violation. The licensee has 10 days from the receipt of this notice to respond. Failure to respond may result in the FCC finding that a violation has occurred. After the licensee is given the chance to respond, the FCC considers how serious the violation is or whether one has occurred at all. If it decides further action is warranted, it can issue a Notice of Apparent Liability, which indicates what violations have been found and how much of a forfeiture is due.

The FCC's forfeiture authority is limited by law to \$25,000 for each violation for each day of a continuing violation, up to a maximum of \$250,000. In 1991, the Commission adopted a new approach to assessing forfeitures. This new approach assigns a "base amount" for each category of infraction, expressed as a percentage of the maximum daily amount of \$25,000, ranked according to the severity of each offense. The Commission also has established a range of upward and downward "adjustment criteria," which are to be used in increasing or decreasing the base amount according to the surrounding circumstances. In its policy statement, the Commission also warned broadcasters that it "remains free . . . to respond to violations with other or additional action, for example, admonishment, revocation or non-renewal." This new approach was challenged in the Court of Appeals for the District of Columbia where it was determined to have been improperly adopted under the Administrative Procedures Act. Although it has, therefore, been suspended and the FCC is considering its future course of action, broadcasters may refer to it as a general rule of thumb as to what they might expect if a violation is found.

In cases involving more serious violations, the FCC may skip the issuance of a Notice of Violation and issue a Notice of Apparent Liability immediately. In fact, in many cases a field inspection will result in the immediate issuance of both kinds of notices, a Notice of Violation for minor infractions and a Notice of Apparent Liability for more serious violations. Field inspectors have now been granted delegated authority to assess a forfeiture on the spot when conducting an inspection.

If a Notice of Apparent Liability is issued, the licensee has 30 days to challenge either the amount of the fine or the FCC's findings of a violation. It can also pay the forfeiture, which ends the proceeding. If the Notice is appealed, the FCC then makes a final decision as to whether a forfeiture is necessary and, if so, the amount.

FCC Misconduct Reports

The FCC requires licensees to report "relevant non-FCC misconduct."

Under this requirement, only adverse adjudications of relevant, non-FCC misconduct must be reported. Pending claims such as pending libel suits or employment discrimination complaints, which have not yet been adjudicated, do not have to be reported. Pending litigation is presumed by the FCC to be irrelevant to a broadcaster's character qualifications.

"Relevant non-FCC misconduct" is defined as including: (a) all felonies; (b) fraudulent representations to governmental units; (c) mass media-related violations of antitrust or other laws dealing with unfair competition; and (d) a pattern of adjudicated non-FCC related employment discrimination. Under this policy, an adverse adjudication of a libel claim would not have to be reported, but the same result in a discrimination case would. The libel suit does not fall into one of the above categories, but the employment discrimination case does. Thus, even a single adverse decision of discrimination must be reported, since it might indicate a possible pattern of conduct warranting FCC examination.

The Commission also interprets Section 1.65 of its rules to require report of adjudications of relevant non-FCC misconduct on an annual basis. The report should be filed on either the licensee's renewal application or, like ownership reports, on the anniversary of the date that the renewal application is required to be filed.

The FCC's policy on reportable misconduct also extends to non-licensee entities which share an officer, director or shareholder/partner with the broadcast licensee, if a principal of the licensee was in control of the other entity or was directly involved in its misconduct. The reporting policy also applies to non-FCC misconduct of a parent or subsidiary corporation if there are principals common to the licensee and the related company was involved in the misconduct. The policy extends only to misconduct of all persons with attributable interest in the relevant entity. It does not apply to employees.

CONTENT REGULATION

The FCC has adopted programming regulations which address policies affecting the selection of material that stations use to air, especially political material. They also address the promotion of contests or events in which the station or its employees hold private commercial interests. Political broadcasting is exceedingly complex and should not be addressed without extensive explanation and considerable study, not available in the space allowed here. A detailed political broadcasting manual by this author and firm, Pepper and Corazzini, is available upon request at (202) 296-0600.

POLITICAL AND PUBLIC AFFAIRS PROGRAMMING

There are two basic groups of rules and policies in the area of political and public affairs programming. The first is the largest, and includes the FCC's regulations affecting political campaigns. These regulations include political advertising rules, regulations requiring that political candidates receive equal air time, laws mandating reasonable access for federal candidates, and regulations requiring every licensee to maintain a political file. The second group of rules concerns the FCC's regulation of commercial practices, including contests and promotions, disclosure of commercial interests, and obscene and indecent programming.

Campaign Programming

A broadcast licensee must provide reasonable access to certain legally qualified political candidates. When a legally qualified candidate makes a use of the broadcast facility during a non-exempt program, then an opposing candidate is entitled to request equal opportunities. The four categories of exempt programs are: *bona fide* newscasts, *bona fide* news interviews, *bona fide* news documentaries, and on-the-spot coverage of *bona fide* news events. Independently produced *bona fide* news interview programs also qualify for the equal opportunities exemption. Thus, syndicated and bartered news interview programs qualify for exemption, provided that their carriage by the licensee is a reflection of "its *bona fide* news judgement and not for the political advantage of the candidate for public office." Certain uses may qualify for the station's Lowest Unit Charge. All uses must be free from censorship, and must bear proper sponsorship identification. Each request for use of the station's facilities, and the disposition of that use must be recorded in the station's political file.

The Communications Act imposes two limitations on the rates that may be charged for political advertisements. They are known as Lowest Unit Charge and the Comparable Use Rules. The Lowest Unit Charge applies for 45 days preceding primary elections and 60 days preceding a general election. It requires that a station determine the lowest advertising rate it is charging its advertisers, including all potential discounts. This rate then becomes the maximum rate that may be charged to *bona fide* candidates in an election for the same length spot during the same part of the day, even if they do not otherwise meet the criteria normally required to qualify for a preferred rate.

The following discussion, although not intended to be exhaustive or complete, highlights some of the most important features of the political rules.

Reasonable Access. The Communications Act itself mandates access only for federal candidates. The Commission has decided that since the statute mentions only federal access, reasonable access applies only to federal candidates and need not be extended to local elections. Thus, the station may, if it chooses, deny access to non-federal candidates. However, if a station chooses to afford access to non-federal candidates, it must also afford equal access to each of that candidate's legally qualified opponents.

Sales of Political Time Within News Programming. A station may adopt policies to exclude candidates from purchasing advertising within news broadcasts.

Sale of Time On the Weekend Before Election. A station must have staff available to sell, produce and/or program candidate spots on the weekend before the election, if it has provided such weekend services to any commercial advertiser at any time during the year preceding the election.

Definition of a "Use". The Commission defines a "use" as any recognizable appearance by a legally qualified candidate in a non-exempt program (exempt programs include *bona fide* newscasts, *bona fide* news interviews, news documentaries, and on the spot coverage of *bona fide* news events). Thus, an "oldies" radio station playing an old Sonny and Cher recording while Sonny Bono is running for political office, could

find itself liable to give away massive amounts of time to Sonny's political opponents.

Disclosure. You must treat a candidate as if he or she does not know the first thing about advertising on your station. This is true even if a candidate works through an advertising agency, political consultant, or some other sophisticated and experienced intermediary. Every factor that could reasonably bear upon a candidate's advertising strategy must be disclosed. In other words, a station must treat a political advertiser as it would treat its most favored advertiser, but assume that they know nothing about advertising on radio or television. Although it cannot be required, it is strongly advised that a station obtain written confirmation from candidates that they have received a full disclosure of sales practices before any political spots are aired.

Classes of Time. The FCC permits a station to establish as many separate classes of time as it wishes, so long as there is a genuine, demonstrable difference between them, not based upon price or quantity.

Rebates. The FCC emphasizes that inadvertent overcharges to a candidate must be discovered and refunded promptly, generally in time to be used in connection with the political campaign.

Improper Sponsor Identification. It is the licensee's responsibility to assure that an adequate sponsorship identification is connected with the advertisement. If reasonable assurances cannot be obtained from the candidate, the station may insert the required sponsorship identification into a deficient spot without providing additional broadcast time, even if it means obliterating some of the candidate's message.

Personal Attack Rules. The Personal Attack Rules require that if, and only if, in the context of a program concerning a controversial issue of public importance, an attack occurs on the honesty, character, integrity or other personal qualities of an identified or easily identifiable person or group, then the station must take the following steps within one week of the attack: (1) notify the person or group attacked of the date and time, and identify the broadcast; (2) send a tape or transcript or, if none are available, as accurate a summary as possible to the attacked party; and (3) offer a reasonable opportunity for response.

Political Editorials. When a licensee airs an editorial, either for or against a legally qualified candidate, it is required to provide notification, a transcript, and an opportunity to reply. If an editorial endorses a candidate, then the notice and the offer to reply must be given to the other legally qualified candidates in the same race. If the editorial opposes the candidate, then that candidate must receive the notice and the reply offer. A station is not obligated to allow the candidate to personally appear in a reply, however, as long as there is an opportunity for someone to air a response. There are specific rules regarding the timing of the notice and reply offer.

Obscene and Indecent Programming

A major regulatory concern is the area of obscenity and indecency. While this area is also regulated by the states, the FCC relies upon a Congressional Act which states that "whoever utters any obscene, indecent, or profane language by means of radio communication shall be fined not more than \$10,000 or imprisoned not more than 2 years or both."

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In 1988, the Commission adopted the following benchmark to determine indecency: "language or material that depicts or describes, in terms patently offensive as measured by contemporary community standards for the broadcast medium, sexual or excretory activities or organs."

Although it qualifies as protected speech under the First Amendment, indecent programming may be required to be channeled to certain hours of the day. However, both a 24 hour ban on such programming was overturned and a midnight to 6 AM safe harbor period was stayed by the court of appeals. The Commission is now enforcing a ban from 6 AM to 8 PM pursuant to a court order. The matter of safe harbor periods remains under appeal at this writing. Obscenity, on the other hand, is not protected speech and may be entirely proscribed. The FCC has no authority to impose criminal sanctions for obscene or indecent broadcasts. Only the Justice Department may bring criminal actions under this statute. However, the FCC may bring administrative sanctions and monetary forfeitures. The Commission has attempted to bring actions to further define indecent programming and the "safe harbor" time period in which it may be presented, and many of those cases are still in litigation. Any broadcaster venturing into this area of speech is well advised to pay close attention to the Commission's litigation over such programming.

Disclosures of Commercial Interests

The Communications Act requires that any announcement or promotion aired by a broadcast station for which money or anything else of value is paid to the station must include an announcement that the matter being broadcast is a paid promotion or advertisement. Moreover, an employee of the licensee who accepts something of value for broadcasting any information or announcement must disclose that payment, in advance of the broadcast to the station's management. Failure to make such disclosures could result in the violation of the FCC's "payola" and "plugola" rules and federal statutes.

Payola is defined as the undisclosed payment of something of value to a station employee for the on-air promotion of goods, services, or events. Payment to a station employee for broadcast of a particular recording is a classic form of payola. Plugola is the promotion by a station of an item or event in which the licensee or one of its employees has an undisclosed financial interest. An example of this would be an on-air promotion or discussion of a concert in which a station employee has a commercial interest. Such a promotion is permissible if the management of the station is aware of the interest and when appropriate sponsorship information is announced. If disclosure is not made, federal law is violated, which can lead to the loss of a license.

Contests and Lottery Rules

The Commission's rules restrict the broadcast of lottery information and impose forfeitures upon stations found to have done so. A determination that a lottery exists requires a finding that the elements of prize, consideration and chance all exist. The Commission will also fine or sanction a station for broadcasting lotteries that were provided to it in the context of syndicated programs that are carried on a barter or cash basis.

The question of whether there is "consideration" is tricky, and what a licensee and the contest promoter may perceive as a free, alternate means of entry could be viewed by the Commission as onerous enough to constitute "consideration," thus making the contest an illegal lottery. It is also important to bear in mind that recent revisions to the laws on lottery permit the broadcast of information about contests that have the element of a lottery so long as the lottery is either authorized or otherwise not prohibited by state law and conducted as a promotional activity by a commercial organization that is clearly "occasional and ancillary" to the main business of the sponsoring organization. Special rules apply to advertising pertaining to Indian gaming.

If the contest has the elements of a lottery, you must check with the appropriate official in your state to determine whether it is permissible under state law. If the state law prohibits the lottery, it is a violation of the Commission's Rules to broadcast information about it.

To provide protection against liability, a licensee should have in place procedures for systematic review of every program, and indemnification provisions in its syndication contracts.

Broadcast Hoaxes

The FCC prohibits the broadcast of hoaxes containing false information concerning a crime or catastrophe. It defines a "crime" as any act or omission subject to criminal punishment and a "catastrophe" as a disaster involving violent or sudden events affecting the public. Thus, the rule does not cover a broadcast that might upset some listeners but does not pose a substantial threat to public health or safety.

A violation of the hoax rule requires a finding of the following three elements:

Licensee knowledge of falsity. The licensee must have known that the broadcast concerning the crime or catastrophe was false. A licensee will be held accountable for the actions of its employees and, therefore, must monitor their actions.

Foreseeability of substantial public harm. The FCC deems public harm to have been foreseeable if the licensee could expect with a reasonable degree of certainty that substantial harm would occur.

Direct causation of substantial public harm. The FCC defines public harm as damage to the health or safety of the general public, diversion of law enforcement or other public health or safety authorities from their duties and damage to property. The public harm must begin immediately after the broadcast and result in actual damage, rather than a mere threat of harm.

PUBLIC INSPECTION FILES

All broadcasting stations are required to maintain a station file open to public inspection. The file must be kept in the station's community of license at an accessible location. If the main studio is in the community, then it must be kept there. If not, then it must be kept somewhere else in the community, and a toll free telephone number must be maintained to provide the public access to station management. The file must be available upon request, without further inquiry except for name and

address, during normal business hours, and the inquiring party must be allowed to copy any portion of it.

The public file must contain a variety of station information. Two of the most important items are the station's annual "Issues/Program List," a list of community issues and the station's most significant programming responding to them, and the Political File.

The "Issues/Programs" List must be prepared every three months and placed in the public file on the tenth day of each calendar quarter. The *Political File* must include a complete record of all requests for broadcast time made by or on behalf of candidates for public office, along with information about disposition and charges. Requests for a specific class or length of time must be recorded even if time is not actually sold.

Records must be complete and self-explanatory. Numerical or shorthand codes are not allowed! Generally, material in the file must be retained for the longer of the license term, or until the FCC grants the first license renewal after the materials were put in the file.

Other items that must be kept in the public file include, with some exceptions, all FCC applications and all correspondence about them between the FCC and the applicant, FCC decisions about the station, and a statement about any petitions to deny which might have been filed against the station. The station must also keep the engineering portion of any application as long as it reflects the current technical operation of the station, and for three years after it becomes obsolete.

The file must also include every ownership report or supplemental ownership report filed after May 13, 1965 for the longer of the usual retention period, or as long as they reflect current ownership. All control, management or programming agreements associated with ownership reports must be filed. For example, network affiliation (television only), citizen group programming agreements, stock pledges, oppositions and proxy statements. While the file does not require agreements with the station personnel and professionals, copies of them must be kept available for inspection by authorized FCC officials.

The station must maintain in the file a copy of every Annual Employment Report with all associated documents and a copy of the station's EEO Program submitted with the last renewal.

The file must include sponsor identification materials for political or "controversial issues of public importance" programming, the FCC publication *The Public and Broadcasting - A Procedure Manual*, letters from the public that do not request anonymity, a certification of compliance with public notice of renewal applications and all other matters which have a "substantial bearing" on a claim or complaint against the licensee or permittee or which relate to a Commission investigation.

NRSC-2 STANDARD

All AM radio stations are required to comply with the NRSC-2 standards showing an absence of spurious emissions, and must take measurements annually to demonstrate compliance with the emission limits contained in Section 73.44 of the Commission's Rules. Measurements must be taken with no more than 14 months elapsing between measurements.

The measurement data must be accompanied by a description of the equipment and procedures used in taking the measurements, and must be signed and dated by the qualified person or persons taking the measurements. The measurements must be kept on file at the transmitter or remote control point of the station for a period of two years, and on request must be made available to representatives of the FCC.

The FCC does not require AM broadcasters to purchase all necessary equipment. Although the FCC suggests using a radio frequency spectrum analyzer calibrated in accordance with Section 73.44(a) of the Rules, a licensee may use "other specialized receivers or monitors with appropriate characteristics." However, any disputes about the accuracy of the measurements will be resolved in favor of measurements obtained by a properly calibrated spectrum analyzer.

DIGITAL AUDIO BROADCASTING

The Commission has established the satellite DAB service in the "S" band. It now has outstanding a Notice of Proposed Rulemaking on standards for licensing that service. To date, it has not established standards for terrestrial digital radio broadcasting and the broadcasting industry is conducting tests of various DAB systems, such as in-band, on-channel systems. The National Radio Systems Committee, a joint effort of the National Association of Broadcasters and the Electronic Industries Association, has convened a committee for exploring various options for in-band, on-channel systems. The committee is continuing to meet regularly in an effort to develop a standard satisfactory to all parties.

On a parallel track, the Commission has accepted six applications proposing satellite DAB service, with those applications proposing everything from all subscription radio to a full commercial service using 28 separate satellites spot beams to major metropolitan areas with each spot beam carrying 16 channels of service, in addition to 16 channels of service covering the entire continental United States. The proceeding remains open.

RADIO BROADCAST DATA SYSTEMS

The National Radio Systems Committee, the joint venture of the National Association of Broadcasters and the Electronic Industries Association, has adopted a Standard for Radio Broadcast Data Systems known as RBDS. The system incorporates the Radio Data Systems (RDS) Standard employed by the European Broadcasting Union and additional U.S. enhancements, such as the In-Receiver Database System (IRDS) and MBS/MMBS the system used by CUE Nationwide Network for FM subcarrier paging and other users of subcarrier data capability. The IRDS system is an in-receiver rom database that is updated by a subcarrier data stream. It will be used primarily to make some RBDS benefits available to AM broadcasters.

RBDS provides radio broadcasters with the opportunity to have a display on the face of the receiver which provides the information identifying the station, its location and the format in which it is broadcasting

FCC PROCEDURES

at the time. The codes are broadcaster controlled and can be displayed on character screens located in the new RBDS radios. They are especially useful to allow the receiver to scan by format. In addition, RBDS can be employed to provide some of the following services: alternate frequencies to have a receiver retune itself to a broadcaster-designated alternate frequency when the one to which it is tuned becomes weak; emergency broadcasts which may replace the existing EBS system; paging services; navigational services for utilization in automobiles and other mobile vehicles and transparent data channels which can be used for any purpose.

PROPOSED RF RADIATION STANDARD

The Commission is seeking to implement more restrictive guidelines for the exposure of workers and the public to radio frequency (RF) radiation. This would conform the Commission's rules to the November, 1992, American National Standard Institute (ANSI) Standards which more severely restrict the amount of environmental RF exposure permitted, cover a broader range of frequencies, set different limits for workers and the general public, and narrow the range of accepted devices. Where there is any question of possible exposure of the general public (including non-technical employees) to RF radiation, the Commission proposes to apply a more conservative guideline.

¹ When more than one applicant seeks facilities which would interfere with one another, the applications are called "mutually exclusive". The Commission's criteria for choosing among mutually exclusive applicants was recently invalidated by the Court of Appeals for the District of Columbia. Until the Commission determines how to proceed, it has frozen mutually exclusive applications.

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KAIJ, Denton, TX [RL/JZ/SS]

Dr. Gene Scott, World University Network
Box 1, Los Angeles, CA 90053
Phone: 800-338-3030
Transmitter: 1 x 100 kw
Targets: Canada, Europe, S. America
Freqs: 5810, 9815, 13740, 15725 KHz

KFBS, Saipan, MP [RL/ET]

Far East Broadcasting Company
Box 209, Saipan, MP 96950
Phone: 670-322-9088
Transmitters: 3 x 100 kw
Targets: Asia, Soviet Union
Freqs: 9465, 9475, 9495, 9670,
11650, 11665, 11705, 15380 KHz

KHBI, Saipan, MP [NX/RL]

Herald Broadcasting
Box 860, Boston, MA 02123
Phone: 617-450-2929
Transmitters: 2 x 100 kw
Targets: Asia, Australia
Freqs: 9355, 9425, 9430, 13615, 13625,
13770, 13840, 15405, 15665 KHz

KHBN, Koror, Palau [RL/ET]

High Adventure Ministries
Box 7466, Van Nuys, CA 91409
Phone: 805-520-9460
Transmitters: 4 x 50 kw
Targets: China, Asia
Freqs: 9965, 9730, 9985, 15140, 11775,
17630 KHz

KJES, Vado, NM [RL/SS]

The Lord's Ranch, Mesquite, NM 88048
Phone: 505-233-2090
Transmitter: 1 x 50 kw
Targets: Canada, Mexico, Australia, P.R.
Freqs: 11715, 15385 KHz

KNLS, Anchor Point, AK [RL/AS/JZ/ET]

World Christian Broadcasting Corp.
Box 681706, Franklin, TN 37068
Phone: 615-371-8707
Transmitter: 1 x 100 kw
Target: Asia
Freqs: 6150, 7355, 7365, 9615, 9690 KHz

KSDA, Agat, GU [RL/ET]

Adventist World Radio - Asia
Box 7500, Agat, GU 96928
Phone: 671-565-2289
Transmitters: 2 x 100 kw
Target: Asia
Freqs: 5950, 5960, 7400, 7455, 9370, 9495,
9530, 9650, 11980, 13720, 15225, 15310,
15610, 17645 KHz

KTBN, Salt Lake City, UT [RL]

Trinity Broadcasting Network
Box A, Santa Ana, CA 92711
Phone: 714-731-1000
Transmitter: 1 x 100 kw
Targets: N. America, Europe
Freqs: 7510, 15590 KHz

KTWR, Merizo, GU [RL/ET]

Trans World Radio Pacific
P.O. Box CC, Agaña, GU 96910-8980
Phone: 671-828-8637
Transmitters: 4 x 100 kw
Target: Asia
Freqs: 7465, 9430, 9475, 9590, 9785, 9815,
9820, 9870, 11580, 11660, 11665, 11700,
11830, 15200 KHz

KVOH, Rancho Simi, CA [RL/SS/TK]

High Adventure Ministries
Box 7466, Van Nuys, CA 91409
Phone: 805-520-9460
Transmitter: 1 x 50 kw
Targets: N. America, Caribbean, S. America
Freqs: 7415, 9975, 17775 KHz

KWHR, Naalehu, HI [RL/ET/TK/RG]

LeSea Broadcasting Corp.
Box 12, South Bend, IN 46624
Phone: 219-291-8200
Transmitter: 1 x 100 kw
Targets: Pacific, Asia
Freqs: 6120, 9930, 11980, 13625, 15405,
17510, 17780 KHz

Voice of America, Washington, DC

[NX/V/ET*]
United States Information Agency (USIA)
Washington, DC 20547
Phone: 202-619-2538
Transmitters: 3 x 50, 7 x 250, 6 x 500 kw in
the U.S.
Additional SW transmitters located in:
Ascension, Botswana, Germany, Greece,
Morocco, Philippines, Portugal, Russia, Sa'd
Tome, Spain, South Africa, Sri Lanka,
Thailand, United Kingdom
Targets: Worldwide
Freqs: various, over 200
*Includes Radio Marti/Cuba

WEWN, Birmingham, AL [RL/ET]

Eternal Word Television Network
P.O. Box 100234, Birmingham, AL 35210
Phone: 800-585-9396
Transmitters: 4 x 500 kw
Targets: 2/3 of the world
Freqs: 5825, 7425, 9540, 11715, 11820,
11875, 13615, 13695, 15695, 18930 KHz

WGTG, McCaysville, GA [RL/TK]

With Glory To God
Box 1131, Copperhill, TN 37517
Phone: 706-492-5944
Transmitter: 1 x 50 kw
Targets: Mexico, Canada
Freqs: 9 and/or 11 MHz Band

WHRI, Noblesville, IN [RL/ET/TK/RG]

LeSea Broadcasting Corp.
Box 12, South Bend, IN 46624
Phone: 219-291-8200
Transmitters: 2 x 100 kw
Targets: N. America, S. America, Europe,
North Africa, Cuba
Freqs: 5746, 6040, 6055, 6185, 7315, 9495,
13760, 15105 KHz

WINB, Red Lion, PA [RL/ET]

Box 88, Red Lion, PA 17356
Phone: 717-244-5360
Transmitter: 1 x 50 kw
Targets: Europe, North Africa
Freqs: 11740, 11950, 15715 KHz

WJCR, Upton, KY [RL/SG]

WJCR Worldwide, Box 91, Upton, KY 42784
Phone: 502-369-8614
Transmitters: 2 x 50 kw (plans for 2 more)
Targets: Europe, Latin America
Freqs: 7490, 13595, 17525 KHz

WMLK, Bethel, PA [RL]

The Assemblies of Yaweh,
Box C, Bethel, PA 19507
Phone: 717-933-4518
Transmitter: 1 x 50 kw
Targets: Europe, Middle East
Freq: 9465 KHz

WRMI, Miami, FL [SS/ET]

Radio Miami International
Box 526852, Miami, FL 33152
Phone: 305-267-1728
Transmitter: 1 x 50 kw
Targets: Cuba, Haiti, Latin America
Freq: 9955 KHz
Note: Also uses WHRI, HRJA, KWHR
transmitters on 9495, 9930, 13760, 15675,
15685 KHz

WRNO Worldwide, New Orleans, LA

[CH/TK/SX/ET/RL]
Joseph M. Costello, III Enterprises
4539 I-10 Service Road, Metairie, LA 70006
Phone: 504-889-2424
Transmitter: 1 x 50 kw or less
Targets: N. America, Europe
Freqs: 7355, 7395, 7415, 15420 KHz

WSHB, Cypress Creek, SC

[NX/RL/SS/ET]
Herald Broadcasting
Box 860, Boston, MA 02123
Phone: 617-450-2929
Transmitters: 2 x 500 kw
Targets: N. America, S. America, Europe,
Australia
Freqs: 5850, 6095, 7395, 7465, 7510, 7535,
9355, 9370, 9430, 9455, 9840, 11645, 11650,
13770, 15665, 17510, 17555, 21640 KHz

WVHA, Scott's Corners, ME [RL]

World Voice of Historic Adventism
Box 1844, Mt. Dora, FL 32757
Phone: 800-447-5683; 904-735-1844
Transmitter: 1 x 500 kw
Targets: Europe, Africa, Middle East, Asia
(soon Latin America)
Freqs: 5850, 7465, 9852.5, 9870, 11695,
13720, 13770, 15665, 15745, 17612.5 KHz

WWCR, Nashville, TN

[RL/TK/ET/CW/SS/DR/OL]
Worldwide Christian Radio
1300 WWCR Ave., Nashville, TN 37218
Phone: 615-255-1300
Transmitters: 4 x 100 kw
Targets: N. America, Europe
Freqs: 5065, 5935, 7435, 9475, 12160,
13845, 15685 KHz

WYFR, Okeechobee, FL [RL/TK/ET]

Family Radio
290 Heigenberger Road, Oakland, CA 94621
Phone: 510-568-6200
Transmitters: 2 x 50, 12 x 100 kw
Targets: Worldwide
Freqs: 5810, 5825, 5890, 5950, 5985, 6015,
6065, 6085, 6105, 6130, 6175, 7355, 7520,
9505, 9550, 9555, 9575, 9605, 9625, 9680,
9690, 9705, 9715, 9770, 9830, 9850, 9985,
11580, 11705, 11720, 11725, 11740, 11770,
11825, 11830, 11835, 11885, 11970, 13695,
15130, 15145, 15170, 15215, 15355, 15400,
15566, 15695, 17725, 17735, 17750, 17760,
17805, 17845, 21500, 21525, 21720 KHz

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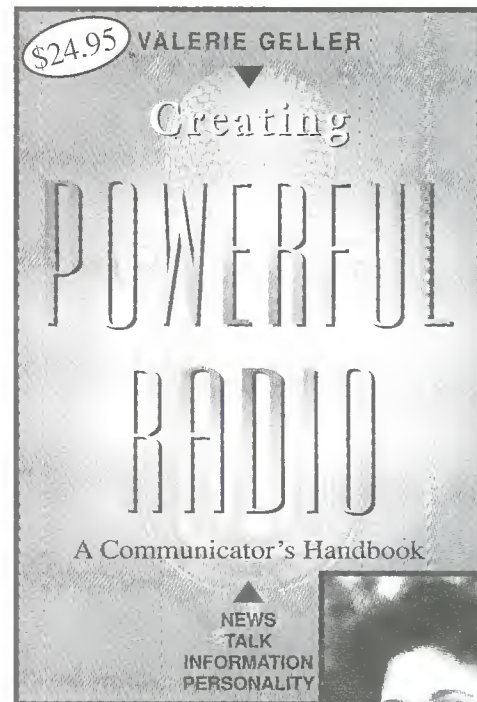
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Author VALERIE GELLER, is an internationally known broadcast consultant and founder of **Geller Media International**™. **Geller Media International**™ offers seminars, one-on-one coaching sessions with air-talent, PD training, and workshops on creating powerful radio news, powerful radio talk, and developing dynamic, habit forming, powerful radio personalities. **Geller Media International**™ also specializes in format changes and format evaluation.

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Other stations owned: _____
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City: _____ State: _____ Zip: _____

Mailing address: _____
City: _____ State: _____ Zip: _____

Phone: _____ Fax: _____

Format: _____
Source(s) (live, automated, network): _____
Slogan: _____
Networks: _____
Rep Firms: _____

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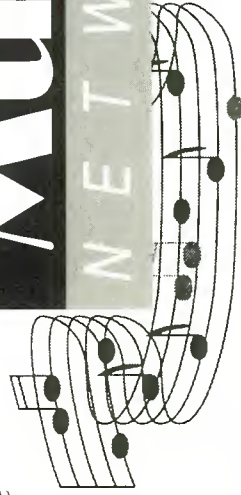
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