

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Petition for Rulemaking to)
Amend Part 73 of the Rules) RM Docket No.)
and Regulations to Establish)
Event Broadcast Stations)

TO: The Commission

COMMENTS IN SUPPORT OF PETITION FOR RULEMAKING OF
WEB SPORTSNET, INC.

DIVERSIFIED VENTURES INTERNATIONAL, INC.

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SUMMARY

Diversified Ventures International ("DVI") urges the Commission to issue a notice of proposed rulemaking calling for the creation of a permanent event broadcast radio service under Part 74 of the Commission's Rules in the 88.1 MHz - 107.9 MHz band. Event broadcasting operations -- secondary to existing authorized spectrum users -- would cover events of limited duration and within the limited geographic confines of a convention center, arena, stadium, or outdoor venue of the event. The service would provide, among other things, commentary on the event as it proceeds, biographical and other relevant material with respect to the participants of the event, information on traffic patterns and weather conditions relevant to the event, and information about facilities (medical assistance, public phones, restrooms, lost and found) available at the event.

To provide an event broadcasting service, a licensee would distribute small, inexpensive radios -- the size of calculators or travel alarm clocks -- that conveniently fit into a pocket and that can receive other existing stations in the area as well as the licensee's proposed service. Event broadcasts could also be heard on conventional radios, allowing spectators to bring their own radios to events and receive the benefit of these broadcasts. As users of the event broadcast service move about on foot throughout the event area or sitting in their seats, they will receive continuous up-to-date information relevant to the event and other breaking news of public concern.

Event broadcasting will promote the innovative and more intensive use of spectrum and provide a beneficial communications service to the public. In addition, the proposed technical standards will prevent event broadcasts from causing harmful interference to primary and other secondary FM stations while still permitting effective operations.

Accordingly, DVI urges the Commission to (1) amend its rules to allow the shared use of the 88.1-107.9 MHz band for event broadcasting, on a secondary basis; and (2) modify its rules to include event broadcast stations as an authorized broadcast service under Part 74.

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**COMMENTS IN SUPPORT OF PETITION FOR RULEMAKING OF
WEB SPORTSNET, INC.**

Diversified Ventures International, Inc. ("DVI") files these comments in support of the petition for rulemaking filed by WebSports Net, Inc. ("WebSports") to develop a permanent event broadcasting service. DVI's proposals will allow expanded use of the existing FM broadcast spectrum in a manner that will improve the information available to the public without causing harmful interference to licensed radio communications services. DVI urges the Commission promptly to issue a notice of proposed rulemaking looking toward establishment of this new service.

I. BACKGROUND

In the Communications Act of 1934, Congress created a system of free broadcast service and directed the Commission to license communications facilities across the country in a "fair, efficient and equitable" manner. 47 U.S.C. § 307(b). Event broadcast stations -- private, low power radio stations that broadcast information and other useful material at various events of limited duration and within a limited geographic space -- provide an innovative service that maximizes the efficient use of the spectrum allocated for FM broadcasting.

As a proposed secondary service, event broadcasts will not harm existing spectrum users. Indeed, by expanding the ability of the public attending an event to pick up other radio stations in the market, event broadcast stations would benefit existing stations by expanding their potential audience base. And event broadcasts will provide a beneficial service to the millions of people who attend events each year -- an audience currently ignored in the provision of broadcast services. Constantly updating listeners, the new service will offer immediate information on event conditions, traffic and people patterns in the event area, as well as commentary and background information on the events as they proceed. Event broadcast stations could also be used to transmit event-related emergency messages and bulletins affecting the immediate welfare of spectators.

DVI seeks actively to participate in the development of an event broadcast service and recently submitted an application to experiment with an event broadcast program.¹ DVI's application provides specific technical and operational information and proposed test programming. It also commits to furnishing the Commission with periodic information upon which to base its consideration of this rulemaking proposal. DVI's experimental operations -- that can begin promptly after authorization from the Commission -- will contribute importantly to the state of knowledge on various issues discussed herein.

¹ See DVI's Application for a New Developmental Broadcast Station for Experimentation with and Development of Event Broadcasting, File No. 970911 (tendered for filing 9/23/97).

II. LICENSING OF EVENT BROADCAST STATIONS

A. Definitions.

DVI suggests that the Commission regulate "event broadcast stations" under Part 74 of its rules. They should be defined as low power FM radio stations that broadcast communications to the public at an event that takes place over a limited time period and within the geographic confines of a convention center, arena, stadium or other indoor or outdoor facility. Examples of events at which broadcasts would be permitted include, but are not limited to, concerts, football games, golf tournaments, horse races or Olympic events. An event broadcast should be permitted from the start of an event until the end of the event -- whether a few hours or several days, provided that the broadcast causes no interference to existing primary and secondary stations. The defining feature of an event broadcast station should be that the station broadcasts information concerning a definable occasion of limited duration that takes place within a limited geographic space.

B. Permissible services.

Event broadcast stations would provide a commercial service with specific programming pertinent to event spectators. Permissible broadcasts include commentary on the events as they proceed, biographical and other relevant material with respect to participants and other features of the events, and information on traffic patterns and weather conditions relevant to the event. In addition, if it is a sporting event, licensees would provide highlights on other sporting events as well as scoring information on the match or game that spectators are watching.

Event broadcast licensees will not duplicate the service broadcast on traditional FM stations, such as information on general traffic control or other information unrelated to the

event. And, of course, event broadcast stations' origination authority will remain secondary in status to full-service FM broadcast stations, thereby maintaining the Commission's preference to provide full service information through primary service stations.

C. Geographic Scope.

Event broadcast licenses can be either national or regional in scope. If regional, licensees could conduct broadcasts at any qualifying event within one of the Regional Economic Area Groupings ("REAGs") in the United States.² Applicants would be required to apply separately for a license to conduct event broadcast operations in more than one REAG. If national in scope, event broadcast licenses could be disaggregated along REAG lines. Operationally, however, they would have to seek specific authority for coverage of a particular event from the applicable regional frequency coordinating committee as set forth in III.A.

D. License Term

Event broadcast licenses should be awarded for an eight-year period subject to automatic termination for (1) failure to conduct at least three event broadcasts within the first six months of operations and (2) failure to conduct at least twelve event broadcasts within each successive year. Applicants would be required to certify in their application for an event broadcast station license (the "License Application") that they will fulfill the six-month and yearly broadcast requirements.

² The REAGs (REAG 1-6) for event broadcast operations should be defined in accordance with the Commission's recent amendments to 47 C.F.R. § 90.7 (Private Land Mobile Radio Services). These rules outline six REAGs: REAG 1(Northeast); REAG 2(Mid-Atlantic); REAG 3(Southeast); REAG 4(Great Lakes); REAG 5(Central/Mountain); and REAG 6(Pacific).

To enforce these broadcast requirements, the Commission should require each licensee to submit an initial qualification report to the Commission on the six-month anniversary after the licensee receives its event broadcast license. In this initial report, the licensee would specify the event(s) and date(s) when it broadcast in the last six months, the technical parameters of its broadcast(s) -- the coordinates, frequency height, and power -- and other pertinent information.³ If the licensee fails to broadcast three events during the first six-months or fails to file an initial qualification report within 15 days after the six-month anniversary, its event broadcast license would automatically terminate. After the six-month report, each licensee should be required to file yearly qualification reports. These reports would contain similar information to that provided in the initial six-month report. However, licensees would be required to show that they broadcast at twelve or more events during the preceding twelve-month period.

E. Eligibility Requirements.

A license for an event broadcast station may be issued to any qualified applicant. Each applicant should certify its intent to broadcast within the technical and operational parameters of an event broadcast station, as specified in Part 74 of the Commission's rules, and complete the certification requirements outlined in the License Application. Although a prerequisite for event broadcast operations, a regional or national event broadcast license should not be sufficient by itself. Instead, each regional or national event broadcast licensee should also be required to obtain an event broadcast permit from the frequency coordinating committee in

³ The first six-month report should also contain the following: (1) a list of any complaints received and (2) the name of the designated contact person during the next year of operations.

the region where the event is to take place (the “Frequency Application”).⁴ Only those event broadcast licensees that hold both an event broadcast license and event broadcast permit for the REAG in which they wish to conduct an event broadcast will be allowed to transmit a signal. The proposed process for obtaining an event broadcast permit is outlined in Section III.A.

F. Application Forms.

Application form 349, currently used to apply for authority to construct FM translator and FM booster stations, could be used as both the License and Frequency Application for event broadcast stations. The License Application would consist of Section I (General Information), Section III (Legal Qualifications) and Section VI (Equal Employment Opportunity Program) and a revised Section VII (Certifications) that would contain certifications specific to event broadcast stations. These portions of Form 349 would first be submitted to the Commission in order to obtain an event broadcast license. The Frequency Application would consist of Section II (Engineering Data and Antenna and Site Information) to Form 349. It, along with the License Application, would be submitted to a regional frequency coordinating committee after the Commission grants the License Application. The Frequency Application should be accompanied by a certification that the licensee has a commitment from an event host to conduct event broadcast operations (see Section III.A.)

III. TECHNICAL PARAMETERS OF EVENT BROADCAST STATIONS

The technical standards proposed by DVI for event broadcast operations will

⁴ A portion of the filing fees received from the License Application for each region would help fund the start-up of regional frequency coordinating committees. Licensees could also be required to pay a yearly sum of money to continually fund the coordinating committees.

ensure that they do not cause interference to other licensed broadcast services, including existing FM full service stations, FM translators and FM booster stations.

A. Frequency Assignments.

Spectrum in the FM band -- channels 201 (88.1 MHz) through 300 (107.9 MHz) - should be considered eligible for event broadcast operations.⁵ Flexibility of channel use within this band offers the possibility of locating event broadcast stations where they can function optimally but without causing interference to other stations. A licensee's use of a particular frequency -- at a particular location and with a certain power and height -- would be conditioned upon advance clearance with the regional frequency coordinating committee located in the REAG where the event will take place (the "Committee").

DVI proposes that the frequency coordinating process take place in the following manner. Not less than two months before an event at which a licensee seeks to conduct an event broadcast, the licensee would submit a Frequency Application to the Committee. The Frequency Application would outline (1) the applicant's event broadcast license number for that REAG, (2) the proposed frequencies,⁶ power, antenna and RF radiation characteristics under which the licensee seeks to operate at the event, and (3) a showing that no interference will result to co-

⁵ Although these comments propose the FM band for event broadcasting operations, the AM band -- 540 kHz through 1700 kHz -- could also be employed. Use of the AM band would be on a secondary basis to existing primary and secondary AM stations users and protection would be afforded in accordance with Section 73.37 (Applications for Broadcast Facilities), Section 90.242 (Travelers Information Service) or Part 15 (Carrier Current Stations).

⁶ An event broadcast licensee could propose to operate on one or more frequencies at a given event. For each proposed frequency, the licensee should be required to satisfy the Commission's technical and operational requirements for event broadcast stations.

channel or first, second or third adjacent channel stations.⁷ In addition to the Frequency Application, the licensee would be required to submit a certification form completed by a representative of the sponsoring organization that states that the sponsoring organization has granted consent to the licensee to provide event broadcasts on a certain number of channels and on certain dates. Only after receipt of both the Frequency Application and the certification would the Committee evaluate the technical parameters of the proposed event broadcasting operations for a particular event.⁸

Once the Committee is satisfied that the proposed technical operations are acceptable, it will confirm the acceptable frequency and either it or the Commission will issue an event broadcast permit to the event broadcast licensee. The event broadcast permit will specify the event for which the licensee is authorized to conduct broadcast operations, the number of channels the licensee may utilize and the technical parameters within which the licensee must operate. At this time, the Commission or the Committee could determine whether the nature of the event warrants a test transmission a certain number of days before the event for which an event broadcast licensee has received an event broadcast permit.⁹ If so, following the test, the

⁷ See 47 C.F.R. 74.1203 (interference rules applicable to FM Broadcast Translator Stations and FM Broadcast Booster Stations).

⁸ If the proposed technical parameters are not acceptable, the Committee may suggest a different frequency for the licensee to test. The licensee would then have fifteen days to resubmit its application specifying the technical facilities that can be used in accordance with the Commission's power, antenna, RF radiation and interference rules.

⁹ For example, a test transmission could be required for events at which the licensee has not previously broadcast. Similarly, the Commission or the Committee could require an engineer to be present at a first-time event or an event with particular circumstances that warrant an engineer's presence. These types of considerations should be made on a case-by-case basis and only after understanding the nature of the event and the licensee's prior experience.

licensee would send an event broadcast deployment letter to the Commission and the regional coordinating committee that indicates that the licensee's event broadcasts will not cause unacceptable levels of interference.

Coordinating committees like those described above have been effectively used for two decades in the case of auxiliary broadcast operations¹⁰ and for nearly four decades in the case of land mobile radio services.¹¹ The frequency coordination process, marked by a high degree of scientific integrity, has effectively reduced controversy and facilitated the fair and efficient allocation of spectrum while conserving Commission resources.¹² The coordination process would be used as effectively in the event broadcast arena to assure appropriate technical facilities for a given event to avoid interference to existing broadcast stations and to resolve licensees' disputes arising out of frequency requests. As appropriate, the Commission would be able to monitor the frequency coordinators' performance through relatively simple licensee surveys and other mechanisms.

¹⁰ See *In re Shared Use of Broadcast Auxiliary Facilities*, 93 FCC 2d 570 (1983) at ¶43 (“[L]ocal frequency coordination remains the most efficient process for licensees to select appropriate television auxiliary frequencies.”). See also *In re Frequency Coordination Procedures for Broadcast Auxiliary Services*, 1 FCC Rcd. 292 (1986).

¹¹ There are over one million private land mobile licenses for over 25 different radio services or categories. Every year, frequency coordinators process thousands of applications by considering the applicant's specialized requirements and the environment in which it seeks to operate. Through their review and dispute resolution responsibilities, the coordinators handle controversies that would otherwise tie up Commission resources and personnel and cause delays on the provision of services to the benefit of the public.

¹² Indeed, the past success and continuing importance of this process prompted Congress to amend the Communications Act in 1982 to affirm the FCC's authority to use frequency coordinators in managing the increasingly crowded private land mobile radio services spectrum. See *The Communications Amendments Act of 1982* (codified at 47 U.S.C. § 332).

B. Power limits.

The effective radiated power (ERP) should be controlled to the lowest acceptable level consistent with the coverage needs of the event, but in no case should it exceed 10 Watts unless a licensee receives prior authority from the regional frequency coordinating committee. To conduct operations in excess of 10 Watts, a licensee would have to establish that 10 Watts of power is insufficient to achieve full coverage of the event. This may be especially appropriate in golf, tennis or other outdoor events not confined to a single stadium and that, therefore, have a larger geographic scope. More importantly, the licensee would have to prove that an increase in power would not adversely affect full-service FM broadcast stations, FM translator stations, FM booster stations or any other event broadcast station that holds both an event broadcast license and a permit to conduct an event broadcast in that region.

C. Antenna location.

The antenna system should be mounted at an elevated position relative to the event area and in an area restricted from general access, but should be kept as low as practical to provide adequate service to the event. To avoid aeronautical issues, the antenna should not exceed 20 feet above the existing structure.

D. Equipment Requirements.

Type accepted, frequency agile FM transmitters should be employed. Access to the transmitter must be restricted and secured against tampering by unauthorized personnel. In addition, a qualified engineer should be required to be on-site during the entire length of the event. The antenna system should consist of 1 or 2 bay non-directional or directional systems

depending on the antenna location relative to the event area to be served. A single polarization, either horizontal or vertical, should be employed.

E. Interference Analysis.

Event broadcast stations are secondary users of spectrum and therefore should not be permitted to cause interference to primary users or to one another. As a general matter, the transmitting site of the event broadcast station should be located outside the protected contour of all existing broadcast operations in the market. In those congested markets where it may be necessary to use a frequency at a location within an existing user's protected contour, FM event broadcast facilities should be designed to achieve a desired-to-undesired interference ratio that will avoid interference to existing stations.¹³ If interference occurs despite coordination efforts, the frequency coordinating committee or the Commission would have the authority to order the licensee to reduce power or if necessary to cease operations until the interference is corrected. Requiring event broadcast licensees to correct any interference caused by their broadcasts should alleviate concerns about the authorization of these stations.

G. Rebroadcasts

In accordance with Section 325(a) of the Communications Act, event broadcasting stations should not be permitted to rebroadcast the programming of another broadcasting station without the express authority of the licensee originating the signal. The Commission should require that consent be obtained in writing.

¹³ Accordingly, in the case of a second adjacent channel, the undesired FM event broadcast signal will not exceed 20 dB above the signal of the existing desired signal and for third adjacent channels, the event broadcast signal will not exceed 40 dB.

IV. REGULATORY REQUIREMENTS OF EVENT BROADCAST STATIONS

Certain provisions of Part 73, subpart H (Rules Applicable to all Broadcast Stations) should apply to event broadcast stations in Part 74, such as prohibitions on obscenity and indecency, restrictions on the broadcast of lottery information and deceptive advertising, and sponsorship identification requirements. The other rules governing traditional FM broadcasts must be tailored to account for the limited duration and nature of event broadcast operations.

A. RF Radiation Compliance.

Exposure to radio frequency (RF) energy should not be an issue due to the low ERP level. There will be no excessive exposure as long as the antenna is restricted from access by at least 1 meter per the current FCC guideline, and by at least 2 meters per the new guideline. Accordingly, an event broadcast licensee must certify to the frequency coordinating committee that the proposed frequency, power and antenna characteristics for a particular frequency will not exceed the requirements for public exposure.

B. Public Inspection File.

Every applicant for and licensee of an event broadcast operation should be required to maintain a public inspection file. This file should contain copies of all licenses, permits, complaints received, reports on event broadcast operations conducted in the past, including the frequency, power, and antenna characteristics employed, and the name of a contact in the event of a technical or other problem. In accordance with Commission rules, the file should be housed in the licensee's headquarters and available to members of the public during regular business hours. The event broadcast licensee must make arrangements to inform members of the public located at the event how they may access the public file. The

Commission should monitor how this requirement is implemented and reserve the right, which it always has, to adjust the requirement to take into account real-world circumstances.

C. Posting of Station License and Permit.

The station's event broadcast license and the permit received from the frequency coordinating committee should be posted near the transmitter at the operating site.¹⁴ Both documents should be readily available and easily accessible.

D. Station Identification.

Event broadcast stations should be required to transmit station identification at the beginning of operations, the end of each period of operation, and hourly, as close to the hour as feasible, at a natural break in the program offerings. Station identification transmissions during operation should not have to be made if doing so would interrupt a single consecutive speech, play or other such production. In such cases, the identification transmission should be made at the first interruption of the entertainment continuity and at the conclusion thereof. Event broadcast stations could use the same pool of call signs as FM broadcasters or FM translators.

E. Equal Employment Opportunities.

The EEO requirements outlined in Section 73.2080 of the Commission's rules should be imposed on event broadcast stations. Every person involved in event broadcast operations at a licensee's headquarters -- defined as the place in which the public inspection file is housed and where the decisions concerning event broadcast operations are made -- should be counted to determine the applicability of the Commission's EEO obligations. The EEO

¹⁴ At each event, a licensee would affix the license and permit to wall or board near the area where the transmitter is located.

requirements should not be defined in relation to the labor pool for a market hosting a particular event because events will last for a limited duration. The EEO requirement for event broadcasters should be subject to the same employee threshold.

F. Political Broadcasts.

In the area of political broadcasting, DVI proposes that the Commission measure compliance in a fashion similar to the requirements imposed on low power and translator stations. That is, event broadcast stations would be required to provide reasonable access to, or to permit purchase of reasonable amounts of time by, legally qualified candidates for federal elective office. Once any legally qualified candidate for public office is permitted to use the facility, the requirements of Section 315 of the Communications Act would apply to access by opponents. However, in applying its reasonable access requirements for federal candidates, the Commission should take into account the length and nature of the event. Thus, a two-hour sporting event will afford only a little time for presidential, senatorial and congressional races. Fortunately, because the service area will be circumscribed, event broadcast operations will not have to accommodate candidates for more than one congressional district or senatorial candidates from more than one state. Nevertheless, the Commission will have to appreciate event broadcasters' need to limit the number of spots they can offer to any one candidate.

G. Public Interest Obligations.

Broadcast stations are licensed to serve the public interest. Event broadcasting is consistent with that general principle. The public they serve will be narrowly circumscribed, consisting of participants and spectators in a particular event. This “public” will be well served by the content to be provided by event broadcasters -- traffic and weather conditions, information about the event, directions about the availability and location of facilities -- and by access to the news and other services provided by regular stations in the area that can be received on the radios to be distributed by the event broadcaster at the event in question. Accordingly, we see no need for a special or additional public interest obligation. If experience shows otherwise, the Commission may add requirements that are tailored to address the needs identified by its experience.

V. CONCLUSION

DVI respectfully requests that the Commission issue a notice of proposed rulemaking to revise Part 74 of its rules to permit the operation of event broadcast stations. The technical, operational and regulatory proposals outlined here attempt to balance the goals of eliminating unnecessary regulatory barriers to the development of event broadcasting stations and maintaining adequate interference protections for authorized radio services. This approach is consistent with Commission's commitment to provide FM radio broadcast services in a manner

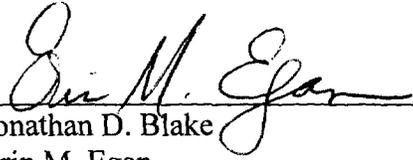
that promotes program diversity and enhances the incentives for efficient use of the broadcast spectrum.

Respectfully submitted,

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EXHIBIT A

Broadcast Regulations Applicable to Event Broadcast Stations.

The following rules should be applicable to event broadcast stations:

Part 73, Subpart G-Emergency Broadcast System.	Section 73.3519-Repetitious applications.
Section 73.1201-Station identification	Section 73.3520-Multiple Applications.
Section 73.1206-Broadcast of telephone conversations.	Section 73.3522-Amendment of applications.
Section 73.1207-Rebroadcasts	Section 73.3540-Application for voluntary assignment or transfer of control.
Section 73.1206-Broadcast of taped, filmed or recorded material.	Section 73.3541-Application for involuntary assignment or transfer of control.
Section 73.1211-Broadcast of lottery information.	Section 73.3561-Staff consideration of applications requiring Commission action.
Section 73.1212-Sponsorship identifications; list retention, related equipment.	Section 73.3562-Staff consideration of applications not requiring action by the Commission.
Section 73.1216-Licensee conducted contests.	Section 73.3566-Defective applications.
Section 73.1510-Experimental authorizations	Section 73.3568-Dismissal of applications.
Section 73.1515-Special field test authorizations.	Section 73.3580-Local public notice of filing of broadcast applications.
Section 73.1635-Special Temporary Authority.	Section 73.3584-Petitions to deny.
Section 73.1940-Broadcasts by candidates for public office.	
Section 73.2080-Equal employment.	Section 73.3587- <i>Informal objections.</i>
Section 73.3500-Application and report forms.	
Section 73.3512-Where to file; number of copies.	Section 73.3588-Dismissal of petitions to deny or withdrawal of informal objections.
Section 73.3513-Signing of applications.	Section 73.3589-Threats to file petitions to deny or informal objections.
Section 73.3518-Inconsistent or conflicting applications.	Section 73.3612-Annual employment report.