

FCC COMMENT
PROCEEDING 14-127
ONLINE PUBLIC INSPECTION FILES

I am a consulting engineering for non-commercial broadcast radio stations, and a full-time director of engineering for a Top-50 market broadcast radio station.

I wish to voice my support for proceeding 14-127 to require licensed broadcast radio stations, including non-commercial/educational stations, to migrate their Public Inspection Files (PIF) to an online web-accessible database.

However, I have some ideas/suggestions:

1. ENFORCEMENT: The FCC's enforcement of Public Inspection File rules has been both capricious and frequently arbitrary. It relies far too heavily on self-reporting and imposes steep monetary forfeitures (fines) for non-compliance at any point, even if the station has recognized a problem and fixed it. With the migration to an online system, discrepancies in PIF compliance become much, much easier to detect. Accordingly, the FCC should shift its enforcement to a model of education, and reserve enforcement for licensees that repeatedly fail to participate in the process at all. A licensee that makes a simple error in filing, or shows that they are trying to submit the correct information but have put in too much/too little of the needed information, should get at least one, if not two or three, opportunities to correct the error. Especially in the first year or two of online PIF's. (however, a licensee that refuses to use the online system at all certainly should receive steep penalties)
2. CAPACITY: Like with television stations, it is the FCC's responsibility to provide a comprehensive and easy-to-use online system for radio stations to upload their PIF's. Accordingly, sufficient capacity for a large number of stations all trying to use the system at once must be provided. The FCC also should provide sufficient email, web-based and telephone-based help desk assistance for the first several months of the new system rolling out.
3. CONTENT: Some items currently required in the PIF is archaic in that better options for acquiring the information are already posted online. Accordingly, anything that is already available online (contour maps, electronic application filings, The Public And Broadcasting, etc) should be exempt from the online PIF entirely, or simply automatically cross-linked to the existing online sources (AM/FM Query, CDBS, etc).