

United States Senate

WASHINGTON, DC 20510

April 24, 2015

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Chairman Tom Wheeler
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Wheeler

We write you today in regards to the Federal Communications Commission's proposal to close field offices across the country. We are particularly interested in the Vancouver, Washington field office that oversees Oregon, Southern Washington and Western Idaho and is on the list of proposed closures.

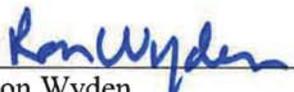
We applaud the FCC for its efforts to modernize their field office staff to keep up with the ever changing telecommunications landscape in the United States. We agree that updates are constantly needed to create an efficient mode of enforcement for radio spectrum usage. While these are encouraging developments by the Commission, we worry that the lack of FCC staff close to our constituents could cause a disruption in policing the airways for local broadcasters.

As you know, the importance of the Vancouver, Washington field office is vital to the television and radio broadcasters in our state. Interference disruptions can delay or disrupt local news, weather and emergency broadcasting that local communities rely on. Oregon needs an FCC field office readily available for broadcasters in order to quickly resolve issues as they arrive. We worry that a field office as far away as San Francisco would not prioritize our constituents, and have a significant delay in response time to broadcasters in the Pacific Northwest.

For those reasons, we request that the FCC, at very least, facilitate public input on the proposed field office closures as this process progresses. We also ask the FCC to consider the needs of our local broadcasters before closing the Vancouver, Washington location, and look to find an alternative solution to this matter.

Thank you for your time and attention to this issue.

Sincerely,


Ron Wyden
United States Senator


Jeffrey A. Merkley
United States Senator



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

May 29, 2015

The Honorable Jeff Merkley
United States Senate
107 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Merkley:

Thank you for your letter dated April 24, 2015 concerning the Vancouver, Washington (Portland) field office of the FCC's Enforcement Bureau (Bureau). The proposal to modernize the Bureau's field activities comes nearly 20 years after the field offices' last major reorganization and is part of a broader effort to improve the management and efficiencies of the Commission's operations. The Bureau and the Office of the Managing Director engaged outside, independent consultants to assess the field offices' activities, personnel, office space and equipment and make recommendations to ensure the alignment of those areas with the agency's overall mission and priorities. The consultants found numerous issues that make it clear that the Bureau's field operations can do more with less:

- Administrative overhead costs to support each field office averaged \$400,000 – more than double that of FCC headquarters.
- The ratio of managers to staff is severely askew – on average one field manager for just four employees while FCC headquarters operates with an average of seven employees per manager.
- The Commission is paying for excessive office space in nearly all field locations, which range between 4,000 and 381 square feet per employee. By comparison, FCC headquarters operates with 272 square feet per employee, and plans to reduce that figure to 180 after FY2017.
- We have more mobile direction-finding (MDF) vehicles than field agents. Each MDF vehicle has a value of approximately \$100,000 in equipment and labor costs. Some offices, however, have two or more MDF vehicles for each agent.
- Our employees and stakeholders agree that radiofrequency interference complaints should be the field offices' top priority. Yet many field offices only receive one such complaint per agent every month. Indeed, less than half of the field offices' total personnel time is spent on spectrum enforcement activity, and a much smaller percentage is spent on critical spectrum enforcement work like public safety interference.

Based on thorough data analysis, the Commission's proposed plan to modernize the field offices includes right-sizing our geographic footprint so field agents may continue to respond to all public safety interference complaints within one day, and to the vast majority of the country within 4-6 hours; increasing the number of electrical engineers at all remaining field offices; and expanding our deployment of staged MDF vehicles throughout the country.

Regarding our recommendation to close the Portland field office, although the office has kept busy with outreach and routine compliance work, it has relatively little radiofrequency complaint

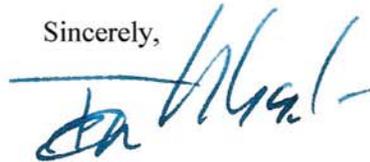
resolution activity. The field office costs approximately \$276,000 each year to maintain. Yet the Portland office received the third fewest radiofrequency-related complaints in the entire field – only 18 matters all year, or about 1.5 per month. That is more than \$15,000 in taxpayer funds per complaint.

Although the Portland staff has provided valuable assistance to local broadcasters and public safety representatives over the years, these matters generally do not require a residence by an FCC agent. We will respond to complaints and requests in the Pacific Northwest from the closest field office (San Francisco). If that office is unable to provide a sufficient response, staff from a dedicated “tiger team” will provide additional support. In addition, we plan to take measures to sustain and enhance the relationships between field personnel and local stakeholders.

Our field offices do an excellent job in resolving radiofrequency issues throughout the country on behalf of numerous private and public stakeholders. Our proposed plan will not change this – the Commission will continue to be well positioned to quickly respond to and resolve spectrum interference complaints, and will do so in ways aligned with establishing a model field organization for the 21st Century.

Thank you for your interest in this matter. If you require additional information or assistance, please contact the Commission’s Office of Legislative Affairs at (202) 418-1900.

Sincerely,

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Tom Wheeler



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

May 29, 2015

The Honorable Ron Wyden
United States Senate
223 Dirksen Senate Office Building
Washington, D.C. 20510

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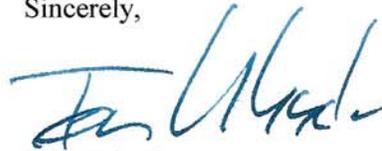
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Tom Wheeler