

ORIGINAL

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Review of the Commission's Rules)
Regarding the main studio and)
Local public inspection files of)
Broadcast television and radio stations)
)
47 C.F.R. §§ 73.1125,)
73.3526 and 73.3527)

MM Docket No. 97-138

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**PETITION FOR PARTIAL RECONSIDERATION AND CLARIFICATION
OF THE REVISED PUBLIC INSPECTION FILE RULE FOR BROADCAST STATIONS
SUBMITTED BY THE NATIONAL ASSOCIATION OF BROADCASTERS**

**NATIONAL ASSOCIATION OF
BROADCASTERS**
1771 N Street, N.W.
Washington, D.C. 20036
(202) 429-5430

Henry L. Baumann
Jack N. Goodman
Lori J. Holy

October 16, 1998

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EXECUTIVE SUMMARY

The National Association of Broadcasters (“NAB”) is seeking partial reconsideration and clarification of several portions of the revised main studio and public inspection file rules. NAB believes some clarifications and minor adjustments to the revised rules are necessary to avoid substantial burdens on broadcasters, but maintain reasonable accessibility for the public.

There are several areas where clarification is necessary. Specifically, NAB seeks clarification on the duties of broadcasters with regard to assisting the public when telephone requests are made. Second, it is necessary to clarify what e-mails are required in the public file. Finally, the revised rules appear to increase the types of applications that are required in the public file. The Commission should clarify what applications should be retained in the public file.

NAB requests that the Commission reconsider the scope of the new telephone request rule regarding access to the public file. First, the Commission should exclude the political file from the new telephone request rule because it is a substantial change from prior Commission policy regarding the political broadcasting rules and poses to be an unnecessary burden without adequate remedies for abuses. Second, the telephone request rule unfairly penalizes stations that have main studios in their communities of license (or outside the community pursuant to a waiver) and who will not relocate their main studio within the increased flexibility provided by the revised rules. These stations are already “reasonably accessible,” and any application of the telephone request rule is burdensome because the intent of the new rule was to provide additional access in situations where stations may become more “inaccessible” to the public. Third, a station should be required to mail documents per a telephone request within its service area only. A station’s public file is intended to provide information to the local community that it serves.

NAB also requests that the Commission put the new “The Public and Broadcasting” manual out for public comment prior to distribution. The manual is intended to be a guide for both broadcasters and the public regarding public file contents. Both broadcasters and the public should be allowed to preview the manual and suggest changes for it to be an effective tool.

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**PETITION FOR PARTIAL RECONSIDERATION AND CLARIFICATION
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The National Association of Broadcasters (“NAB”)¹ requests that the Commission reconsider portions of its *Report and Order*² revising the main studio and public inspection file rules for broadcast stations. NAB believes some minor adjustments and clarifications are necessary to avoid substantial burdens on broadcasters, but still will maintain reasonable accessibility of the public file.

I. INTRODUCTION

In this proceeding, the Commission set a goal to “strike an appropriate balance between ensuring that the public has reasonable access to each station’s main studio and public file and minimizing regulatory burdens on licensees.”³ NAB believes that, on the whole, the

¹ NAB is a non-profit, incorporated trade association that serves and represents U.S. radio and television stations and networks.

² *Report and Order* in MM Docket 97-138, ___ FCC Rcd. ___ (August 11, 1998) [hereinafter “*Report and Order*”].

³ *Id.* at 5 (citing *Notice of Proposed Rule Making*, 12 FCC Rcd. 6993, 6999 (1997)).

Commission did accomplish this goal. NAB seeks clarification of several aspects of the *Report and Order*. First, the revised rule outlining the telephone request rule is vague. Broadcasters would benefit from additional guidance from the Commission concerning the duties of a station if a telephone request is made. Second, it is important that the Commission clarify what e-mail messages will be required in the public file. Third, the new public file rule appears to increase the number of applications retained in the public file. NAB seeks clarification of the types of applications that are to be maintained in the public file.

NAB believes some minor adjustments could lessen the burdens on broadcasters, but maintain the public's access to the station. First, stations have always been required to provide reasonable access to their public files. Over the years, the Commission has modified the rules, balancing the burdens and benefits for both broadcasters and the public. In the latest revisions, NAB believes the Commission failed to consider the impact of requiring stations to respond to public file requests over the telephone, particularly requests from candidates for public office and their representatives.⁴ The new rule will impose substantial burdens on stations when dealing with political candidates. Thus, the political file should be excluded permanently from any telephone request requirement.

⁴ New section 73.3526(c)(2) provides that:

The applicant, permittee, or licensee shall make available, by mail upon telephone request, photocopies of documents in the file, and the station shall pay postage. Licensee shall mail the most recent version of "The Public and Broadcasting" to any member of the public that requests a copy. Licensees shall be prepared to assist members of the public in identifying the documents they may ask to be sent to them by mail, for example, by describing to the caller, if asked, the period covered by a particular report and the number of pages included in the report.

Report and Order at 44.

Second, NAB requests that the Commission alleviate the burdens of the new telephone request rule by exempting all stations that maintain their main studios within their community of license (or pursuant to a waiver under the previous rules) and who do not relocate their main studio within the increased flexibility of the revised main studio rules. These stations already have main studios that are deemed “reasonably accessible.” The new telephone request rule will unreasonably burden these stations because it imposes a new duty where the public is not inconvenienced due to a move of the main studio.

NAB also requests that the Commission limit the mailing of documents per a telephone request to mailing addresses within the station’s service area. The purpose of the public file is to provide information to the public that the station serves. It would not advance the interests served by the public file to require stations to send public file documents to individuals outside their service area.

Finally, NAB requests that the Commission put the new version of “The Public and Broadcasting” on public notice for comment and review before adopting it. The new manual is intended to provide guidance to both the public and broadcasters, and it appears that it will be substantially different from its 1974 predecessor. The public and broadcasters should be able to provide comment to ensure it is accurate and useful to the public.

II. NECESSARY CLARIFICATIONS

A. The Commission must clarify the responsibilities of a station if telephone requests are made.

It is essential that the Commission clarify the duties of stations in assisting the public when a telephone request for public file documents is made. The language in the revised rule and the accompanying language from the *Report and Order* do not offer much guidance to stations. The Commission is requiring licensees to “assist callers in this process,” and to

“answer questions they may have about the actual contents of the station’s public file.”⁵ The Commission provides, as an example, that “stations, if asked, should describe to a caller the number of pages and time periods covered by a particular ownership report or children’s programming report, or the types of applications actually maintained in the station’s public file and the dates they were filed with the FCC.”⁶ It is unclear if this is the extent of the “assistance” that the Commission expects from stations under the revised rules.

Although the Commission attempted to provide some guidelines in the new rule, further guidance is necessary. For example, presumably an individual could simply ask the right questions and gain the specific information contained in the documents from the station employee on the phone, which would eliminate any need for the documents to be mailed. If this is the intent of the new rule, then station employees essentially become the research assistants for the public. Clearly, this would be an unreasonable burden on stations.

Additionally, the Commission must consider the potential burden of the new rule on staff resources – particularly for smaller stations. The Commission already has recognized the significant burden placed on small broadcast stations with regard to station staffing. The FCC has “unchained” the desks to allow stations some additional flexibility in staffing requirements.⁷ It is reasonable to require a station to have at least one person at the station during business hours to allow access to the public file. It is a drastic increase to require stations to have one or more

⁵ *Id.* at ¶ 24-26.

⁶ *Id.* at ¶ 24.

⁷ The Commission expressed a need for a “meaningful staff presence” when it last revised the main studio rules. *See Amendment of Section 73.1125 and 73.1130*, 3 FCC Rcd. 5025 at ¶ 24 (1988). The term “meaningful” was defined to required full-time managerial and full-time staff personnel during normal business hours. *See Application for Review of Jones Eastern of the Outer Banks*, 6 FCC Rcd. 3615 at ¶ 9 (1991).

staff members with intimate knowledge about the public file on hand to assist callers. The new rule threatens to re-chain a staff member to the phone. The Commission should consider the realities surrounding this new requirement and clarify that there is no intent to require that stations give information over the telephone regarding the contents of specific documents. The rule should be clarified to state that stations should be required to assist callers, only by providing a list of available documents, dates of filing and the length of the documents.

B. The Commission must clarify the requirement regarding the retention of e-mails received from the public.

In the *Report and Order*, the Commission extended the scope of the retention rule for letters from the public to include electronic mail messages (“e-mails”).⁸ Although the Commission provided some relief in the form of solutions for “bulk e-mails” and maintaining the e-mails in electronic form,⁹ there should still be clarification regarding what e-mails are to be retained.

The Commission noted that comments on this proposal were mixed and noted that several comments stated that finding and determining what letters from the public are to be maintained becomes onerous when entering an electronic world.¹⁰ NAB agrees that finding and routing e-mails can be more difficult. In many instances, each employee of a station may have his or her own e-mail account. Individual programs may have their own e-mail accounts. The station itself may have one “suggestion box” e-mail account on its webpage. If each of these accounts were required to monitor for e-mails from the public, the burden becomes great.

⁸ *Report and Order* at ¶ 38.

⁹ *Id.* at ¶ 41.

¹⁰ *Id.*

Further, there are privacy issues to consider. There is a potential violation of an individual employee's expectation of privacy in his or her personal e-mail messages. It is possible that personal e-mail messages could contain references to the operation of the station; and thus, require retention in the public file. NAB requests that the Commission clarify this portion of the rule to reflect that stations only have to retain e-mails that are intended to specifically express comments on the operation of the station and that are sent to the station through a publicized e-mail address. This clarification will provide stations with greater certainty regarding what e-mails should be retained.

C. The Commission must clarify the rule regarding the retention of applications.

From the beginning of the Commission's public file rule, stations have been required to maintain applications and related materials that are tendered for filing with respect to which local public notice is given.¹¹ In determining what applications should be retained locally, the Commission rejected its initial proposal that required all applications to be maintained in the public file.¹² It reasoned that the major applications are the only applications that the public would be concerned about.¹³

In the latest revisions to the public file rules, the Commission "requires the retention of applications filed with the FCC ...".¹⁴ In the revised rule, the Commission has deleted any reference to limiting the retention of specific types of applications – namely only the retention of

¹¹ See *Report and Order* in Docket No. 14864, 4 RR 2d 1664 (1965) [hereinafter "*1965 Report and Order*"].

¹² *Id.* at ¶ 3.

¹³ *Id.* at ¶ 17.

¹⁴ *Report and Order* at ¶ 54.

the major applications that require public notice.¹⁵ However, in other points in the *Report and Order*, the Commission also refers to the fact that not *all* applications may be maintained in the public file.¹⁶ Furthermore, it was not contemplated in the *Notice of Proposed Rule Making* that the application retention portion of the rule would be altered to *increase* the types of applications maintained.¹⁷

NAB requests that the Commission clarify this section of the revised rule to indicate that the major applications which require public notice are required to be maintained in the public file, and not *all* applications filed with the Commission. Just as it was 33 years ago, the major applications are the only applications in which the public is likely to have an interest.

III. ADJUSTMENTS TO THE REVISED RULES

A. The Commission should exclude the political file from the new telephone request rule.

On August 18, 1998, NAB asked the Commission to stay the effective date of the new telephone request rule as it applies to political file documents to avoid the disruption that would occur by changing the political broadcasting rules in the middle of a Federal election campaign.¹⁸

¹⁵ The former public file rule required the retention of “a copy of every application tendered for filing, with respect to which local public notice is required to be given . . .” 47 C.F.R. 73.3526(a)(1) (1996).

¹⁶ See *Report and Order* at ¶ 24. “Stations, if asked, should describe to a caller . . . *the types of applications actually maintained in the station’s public file . . .*” (emphasis added). This implies that the Commission did not intend to change the rule to require the retention in the public file of *all* applications filed with the Commission.

¹⁷ *Notice of Proposed Rule Making* in MM Docket 97-138, 12 FCC Rcd. 6993 at ¶ 24. The Commission contemplated *decreasing* the types of applications retained in the public file when it asked, “are there certain applications covered by the existing rule that no longer need to be maintained in the public file?” *Id.*

¹⁸ See NAB’s *Motion for Partial and Temporary Stay* in MM Docket 97-138, filed August 18, 1998 [hereinafter “*Motion for Stay*”].

The Commission subsequently granted our Motion for Stay and delayed the effective date of the new rule as it applies to the political file only.¹⁹

The delay of the effective date dealt with the problem for this election cycle, but the burdens imposed by allowing telephone access to the political file will reoccur unless the Commission permanently exempts the political file from the telephone request rule. Candidates (or their representatives) are the heaviest visitors to a station's public file. During an active campaign, visits could be daily.

The Commission must consider the realistic impact of its rule before imposing such a regulation on the political file. The disruption and burden on broadcasters is substantially greater than the burden on candidates to seek out the political file at the station's main studio, wherever located. As the rules have been traditionally interpreted, stations are not required to notify candidates of any equal opportunity rights.²⁰ Stations may provide information to candidates over the phone, but are not required to do so.²¹ The new rules mandate that stations provide assistance to callers who make telephone requests, and candidates would likely interpret the rule to require stations to give descriptions about the actual contents of the file over the telephone. This is a substantial alteration to the way stations deal with political candidates.

¹⁹ *Order* in MM Docket 97-138, ___ FCC Rcd. ___, released September 19, 1998. The effective date was extended to November 4, 1998.

²⁰ *See Motion for Stay* at 2. In the Commission's 1984 *Political Broadcasting Primer*, it is stated that "[i]f a station sells or gives time to one candidate, it need not notify opponents of the fact" because they can obtain such information by inspecting the station's public file. 100 FCC 2d 1476, 1505 (1984).

²¹ NAB's *Political Broadcast Catechism* (14th ed.) points out that "[s]tations do not have to provide political broadcast file information by telephone or mail unless they choose to do so." *Political Broadcast Catechism* at 2 (1996). *See Appendix A*.

The Commission declined to limit the number of phone requests to which the station would have to respond because it concluded that it had no evidence that stations would be “overwhelmed by such requests.”²² Clearly, the Commission did not consider the impact of such a rule on the political file.²³ If a station were required to respond to daily calls from numerous candidates regarding their opponents’ appearances, it will quickly turn into an extraordinary burden where station personnel could spend a substantial amount of time responding to phone requests.²⁴

Although NAB agrees that the information needs to be reasonably accessible, at this point in time, there is no evidence that the political file information will become “inaccessible” to candidates. Candidates and their representatives are less likely to be burdened in seeking out the political file at the main studio. Access to the political file is most often sought by professionals waging a campaign. It is not unreasonable to expect that candidates and their representatives would be more able to visit the main studio and public file wherever it is located without there being any substantial burden if the studio were moved elsewhere in the community.

The new telephone request rule threatens to go far beyond the Commission’s intent by establishing an unnecessary burden on stations when the information is still reasonably available through traditional means. The Commission should reconsider its decision to impose such an

²² *Report and Order* at ¶ 25.

²³ As pointed out in NAB’s *Motion for Stay*, the Commission did not consider the impact on the political broadcasting rules because it specifically stated that “[w]e are making no substantive changes to our current political file requirements.” *Report and Order* at ¶ 54. In fact, the new telephone request accommodation substantially alters the political broadcasting rules.

²⁴ The Commission did note that a station could seek a waiver of the rule if a substantial burden or abuse arises. *Report and Order* at ¶ 25. However, this option would be more time consuming for the Commission and stations than simply excluding the political file from the rule.

obligation on stations. NAB requests that the Commission permanently exclude political file contents from the telephone request rule in the revised public file rules.

B. The Commission should exclude all stations from the telephone request rule who are currently located in their community of license (or outside community of license pursuant to a waiver) who do not relocate their main studio within the increased flexibility provided by the revised rules.

In the *Report and Order*, the Commission states that the new telephone request rule will “ensure that public file material continue to be reasonably accessible to all members of the public.”²⁵ NAB believes the new rule unfairly penalizes those stations that already have – and will continue to maintain – their main studios in a reasonably accessible location.²⁶ The apparent intent of the telephone request rule is to provide an additional means of access in light of the new flexibility in the main studio location rules.²⁷ An increase in the number of location options does not result in a lack of access where the station does not move its main studio.

There is no added burden to the public who are served by stations with main studios in the community of license (or outside the community pursuant to a waiver) and who will maintain a main studio within the prior location restrictions. Thus, NAB requests that the Commission revise the telephone request rule to exclude those stations that already maintain their main studios within the community of license (or pursuant to a waiver prior to the August 1998 *Report*

²⁵ *Report and Order* at ¶ 24.

²⁶ Stations that currently maintain their main studios within the community of license, or outside the community of license pursuant to a waiver, are presumably already reasonably accessible to the public.

²⁷ The revised main studio rule allows stations to locate the main studio within the principal community contour of any station of any service licensed to the same community or within 25 miles of the community center. *Report and Order* at ¶ 7. NAB proposes that the telephone request rule only apply to those stations that move their stations outside their community of license (or from their location granted by waiver) to take advantage of the location flexibility in the new main studio rules.

and Order) and choose not to relocate the main studio to a location within the flexibility provided by the new rule.

C. The Commission should limit the mailing of documents pursuant to a telephone request to within the service area of the station.

The intent of the public inspection file rule was to provide the local public with information about a station that is licensed to serve their community.²⁸ In the *1965 Order*, the Commission required stations to retain copies of major applications and reports in a local file. Over the years, even as the Commission expanded the contents of the public file, the purpose of providing pertinent information to the local community of which the station did not change.

NAB believes that any alteration to public file access should bear in mind the purpose behind the rule. Nothing in the Commission's rationale for the new rule speaks to extending public file access to those outside the viewing and listening area. When the public file rule was established in 1965, the primary purpose was to "make information to which the public already has a right more readily available so the public is encouraged to play a more active part in a dialogue with broadcast licensees."²⁹ The Commission intended that the *local* community should assess its needs and articulate its desire for needed broadcast service.³⁰ Thus, it is only those members of the public who reside and listen to the station who would have any need or interest in the contents of the public file.

Further, an individual must have the proper standing to participate in any FCC proceedings. For example, in *Norman A. Thomas*, the Commission denied standing to petitioner Thomas because he failed to allege that he was a listener of the station or that he lived within the

²⁸ See *1965 Report and Order*, *supra* note 11, at ¶ 11-12.

²⁹ *Id.* at ¶ 11.

³⁰ *Id.* at ¶ 12.

service area of the station.³¹ Thus, if a station is required to mail copies of documents in response to a telephone request from its public file, it should be required to mail those documents to addresses within the station's service area only. The public file is intended to assist the local community. The local listeners are the individuals who have the proper standing and interest in the documents. NAB requests that the Commission revise the rule to include this limitation regarding the mailing of public file documents pursuant to a telephone request.

D. The Commission should put the new version of “The Public and Broadcasting” manual out for public comment prior to distribution.

In the *Report and Order*, the Commission refused to eliminate the portion of the public file rule that required the retention of the manual, “The Public and Broadcasting”.³² Instead, the Commission decided to retain the rule that requires the retention of the manual when the new version is published.³³

The new manual purports to be dramatically different from the 1974 version. The Commission expects that it will be a “guide” to the public file for use by both the public and broadcasters.³⁴ The Commission requires that broadcasters offer the manual to the public to assist them in requesting public file documents.³⁵ Due to the fact that the manual is a required element of the public file, NAB believes the Commission should place the manual out for public comment before stations are required to distribute it. The public and broadcasters should have

³¹ 53 FCC 2d 646 at ¶ 2 (1975).

³² *Report and Order* at ¶ 32.

³³ *Id.*

³⁴ *Id.*

³⁵ *Report and Order* at ¶ 24.

the ability to preview the document to verify its accuracy and to propose changes to make sure the manual is a useful tool for the public.

IV. CONCLUSION

For the forgoing reasons, NAB respectfully requests that the Commission reconsider and clarify its *Report and Order*.

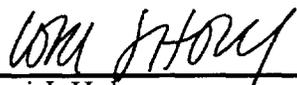
Respectfully Submitted,

**NATIONAL ASSOCIATION OF
BROADCASTERS**

1771 N. Street, N.W.
Washington, D.C. 20036
(202) 429-5430


Henry L. Baumann


Jack N. Goodman


Lori J. Holy

October 16, 1998

Appendix A

Political Broadcast Catechism

Fourteenth Edition



RECORD RETENTION

invoice to the political time order already in the file.) The records must be retained for two years, and must be maintained in an "orderly" manner so that they can be accessed easily. (*Political Programming Policies*, 7 FCC Rcd. 678, 698 [1991]; *Political Programming Recon.*, 7 FCC Rcd. 4611, 4621 [1992].) Stations may wish to establish a policy under which all political file records which are not the subject of a pending dispute with a candidate are purged at the end of the required two-year retention period.

The FCC has stated that in addition to the information described above, which is required by the FCC rules, "if the station provides candidates with a written disclosure form or statement, it may be advisable to *maintain* a copy of that form in the political file. In some circumstances it may also be advisable for a station to include a description of particular sales practices that would be significant for candidates, and how they would apply to candidates. Given the vast variation in sales practices from station to station, it is not possible to provide here an exhaustive list of all things that could be included in the political file." (*Political Programming Recon.*, 7 FCC Rcd. 4611, 4621 [1992].)

Requests and disposition of requests for political broadcast time are subject to public inspection and copying during normal business hours in accord with the Commission's public file rules. Stations may charge a reasonable amount for copying. Stations do not have to provide political broadcast file information by telephone or by mail unless they choose to do so. If they do, they should furnish such information on a non-discriminatory basis to all candidates or their official representatives.

2. Are licensees required to keep scripts or recordings of political spots or programs?

FCC rules do not require that stations keep scripts or recordings of political announcements or programs, nor make them available to anyone. Stations may wish to keep recordings or scripts, however, as a safety factor in the event of a complaint or controversy involving a political announcement or program. FCC rules do require that scripts or summaries of editorials endorsing or opposing political candidates be made available to opposing candidates. (See 47 C.F.R. § 73.1930.)

Sponsorship Identification

3. What Commission rules govern sponsorship announcements for political broadcasts?

The Commission's sponsorship identification rule (47 C.F.R. § 73.1212) implementing Section 317, applies to political announcements and programs.

Radio stations may request but cannot require that political ads be submitted sufficiently far in advance to allow review for sponsorship identification. However, if a candidate refuses to allow previewing, the station should presume that it is responsible for adding the sponsorship identification. (*Political Programming Policies*, 7 FCC Rcd. 678, 687 [1991].) Because television stations now have specific sponsorship identification criteria, the Commission believes that under normal circumstances, television stations should have the right to pre-screen ads for sponsorship identification compliance. However, in circumstances in which there is not sufficient time for a television station to pre-screen a spot and still get it on the air as requested by the candidate, the ad may be run once without the station being subject to sanctions for violating Section 317. Once the ad has aired, the television licensee will be responsible for complying with the sponsorship identification rules. (*Sponsorship Identification Recon.*, 7 FCC Rcd. 1616 [1992].) Both radio and

What Constitutes Equal Opportunities?

54. If a station sells time to Candidate A, must the station give free time to opposing candidates who request it?

No. The law requires equal opportunities for candidates — not “equal time.” Other candidates must be provided the opportunity to purchase comparable time at an equal rate. (But see Q&A 56 which indicates that employee-candidate “uses” may trigger equal opportunity rights in opposing candidates to free comparable time. Q&As 27-28 also discuss such employee-candidate “uses.”)

55. Is a station’s obligation under Section 315 met if it offers a candidate the same amount of time an opposing candidate has received, where the time of the day or week afforded the first candidate is superior to that offered his opponent?

No. The station, in providing equal opportunities, must consider the desirability of the time segment allotted as well as the amount of time. While a station is not required to afford candidate B exactly the same time of day on exactly the same day of the week as candidate A, it must offer time segments of comparable desirability. Desirability is based primarily on the exposure provided the candidate. Exposure invariably is a function of potential audience at the time the candidate appears.

56. An announcer-candidate conducted a 45-minute interview program Monday through Friday. His opponent requested equal opportunity in the form of spot announcements equal to the total on-air time of the announcer-candidate. Was the opponent entitled to the spot announcements?

No. The opponent was technically entitled to the same amount of free time in comparable time periods to those used by the announcer-candidate. The FCC noted, however, that in such complex circumstances it will leave the working out of the mechanics of the problem to the parties subject to the rule of reason. (Letter to *RKO General, Inc.*, 25 F.C.C.2d 117 [1970].) Note that as a general matter, the opponent of an announcer-candidate will only be entitled to equal opportunities for the amount of time the announcer-candidate is actually on the air, not the entire length of the program on which he or she appears (*Alan Y. Naftalin (WNEP-TV)*, 40 F.C.C. 431 [1965].)

57. Must a station advise a candidate by mail or telephone that time has been sold to other candidates?

No. It is the candidate’s obligation to derive this information from the station’s political file. It should be noted again that a station is required to keep a public record of all requests for time by or on behalf of political candidates, together with a record of the disposition and the charges made, if any, for each broadcast. (47 C.F.R. § 73.1943.) (Updates must be put in the political file as soon as a request for time is made. See Q&A 1.)

However, if a station chooses to advise a candidate of the sale of time to his opposition, it must provide the same information to the candidate’s opponents. The licensee is not permitted to discriminate between the opposing candidates in any way.