



The

Broadcasters' Desktop Resource

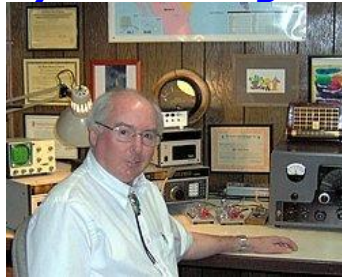
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FOCUS ON REGULATION

Broadcast Station Hourly Identifications - When and How?

By Mike Langner



[September 2009] This is one of a series of articles taking a look at various FCC Rules and how they can be understood and applied.

According to the FCC, broadcast stations (and nearly every other kind of licensed station as well) are supposed to provide clear, easily understood station identification announcements. This was the background of the famous line, initiated as a “heads up” from the radio networks to the local affiliates: “*We now pause for station identification ...*”

STATION IDENTIFICATION

While the time requirements vary from radio service to radio service, for broadcast stations, FCC Rule 73.1201 asks for station identifications to be made “(1) *At the beginning and ending of each time of operation, and (2) Hourly, as close to the hour as feasible, at a natural break in program offerings.*”

73.1201 then goes on to provide some “fine points” as to exactly what constitutes a “legal ID.” The most pertinent part for our discussion is section 73.1201(b): *Content. (1) Official station identification shall consist of the station's call letters immediately followed by the community or communities specified in its license as the station's location; Provided, That the name of the licensee, the station's frequency, the station's channel number, as stated on the station's license, and/or the station's network affiliation may be inserted between the call letters and station location.*

At the end of the section (b)(1), the Rule addresses digital (HD) operations by stating: *A radio station operating in DAB hybrid mode or extended hybrid mode shall identify its digital signal, including any free multicast audio programming streams, in a manner that appropriately alerts its audience to the fact that it is listening to a digital audio broadcast. No other insertion between the station's call letters and the community or communities specified in its license is permissible.*

SOME EXAMPLES

Correct:

KXXX, Lakewood, CO

Incorrect:

KXXX, serving Denver from Lakewood, CO

Should you use the suffix AM or FM? This depends upon what is on your license. If the license says KXXX-AM or KXXX-FM, then that is the station ID. If it is not on the license, it is not part of the ID. For example, an AM/FM combo usually is identified as KXXX and KXXX-FM. A stand alone FM would be KXXX.

However, consider the case of KXXX AM and FM, when the AM changes format and become KYYY. The FM would normally switch to KXXX – *unless* the FM's license was not adjusted when the AM was changed. In that case, it would still be KXXX-FM, even though no KXXX AM existed.

The easiest way to be correct is to use the call sign that is on your license.

TIMING

So what does the Rule mean when it says, *“Hourly, as close to the hour as feasible, at a natural break in program offerings?”*

In the past, the Rule was simple: the station ID had to be within two minutes of the top of the hour or at a natural break. This was originally meant to prevent unnecessary interruptions to long-form programs like operas and professional sports.

Today, some programmers have stretched the meaning of “natural break” to where they stick the station identification in the middle of a stop set at :47, effectively burying it in the middle of a raft of commercials, where it presumably would not be heard (what that says about the programmers' view of those commercials is a topic for another day!).

Worse, at the same time some stations “bury” the ID ten or twelve minutes before the hour, they seem to have no trouble running a positioning logo or jingle at the top of the hour. This is clearly outside the intention of the Rules.

A natural break have been defined by FCC personnel as occurring at the end of each song. Therefore, segued music does not remove the requirement to run the ID close to the top of the hour. Furthermore, as several Inspectors have noted, if the station can run a positioning logo or jingle in a music sweep at the top of the hour, it can run an ID.

FCC records show Notice of Violation citations having been given to stations who run IDs five to eight minutes from the hour.

A QUESTION FOR DISCUSSION

But do we *really* need station IDs any more – or is merely a left-over bureaucratic rule solely to make stations jump through hoops?

We will discuss this further in a forthcoming installment.

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