



The

Broadcasters' Desktop Resource

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... edited by Barry Mishkind – the Eclectic Engineer

Ask the Lawyer

Meeting the Translator and Booster Station Log and Records Rules

By Cary S. Tepper

[July 2014] Do you have a question about FCC Rules or procedures? Communications Attorney Cary Tepper is at your service:

Question: *Yesterday we received a "Notice of Violation" from the FCC for failing to maintain "proper station logs and records" for our FM translator station. What does the FCC require?*

Cary Tepper: In Section 74.1281 of the FCC Rules and Regulations it requires that all translator stations keep logs and records.

These logs should clearly and accurately document all repairs, changes and other maintenance performed on station equipment during the past two years. Such entries should include equipment status, equipment calibration and maintenance and, if applicable, tower light outages.

These logs and records should also include a copy of all the FCC's authorizations pertaining to the station, any and all correspondence with the FCC, and the rebroadcast consent letters from the Primary Station, if applicable.

If your station has secured a renewal of its FCC license, please make sure you maintain a copy of the full FCC license with all of the operating specifications on it, as well as the simple one-paragraph license renewal authorization.

LOG AND RECORDS LOCATIONS

If the translator or booster station is licensed to the same entity as the Primary Station, these

logs and records may be kept at the same location where the Primary Station records are kept.

If the translator or booster station is not owned by the same entity as the Primary Station, these logs and records must be kept at any accessible place in the community of license of the translator or booster station.

ACCESSIBILITY AND COMPLETENESS OF THE LOGS AND RECORDS

The station logs and records must be readily available for inspection and duplication at the request of the FCC or its representative during regular business hours – that is Monday through Friday, from about 9:00 am until 5:00 pm.

Unlike a regular a full power station, the general public does not have an absolute right to see these logs and records, but there is no harm in allowing such access under proper station supervision to ensure that the logs and records remain intact.

As with all FCC-required logs and records, you are responsible to maintain the accuracy and completeness of these documents every 30 days.

TRANSMITTER SITE SIGNAGE REQUIREMENTS

Each year the FCC fines several FM translator station licensees for failing to display the proper sign at its transmitting site.

Reviewing the FCC's Rules (Sections 74.1265 for FM and 74.765 for TV), you will see the FCC requires all translator and booster stations to maintain a sign at the transmitting site that contains:

- the station's call sign,
- the licensee's name, address, telephone number (or the name, address and phone number of a local representative), and
- the location where the station's files are maintained.

This sign should be conspicuously placed on the tower structure so that a person standing on the ground at the transmitter site can easily see it. The sign should be maintained in good condition, and be made of weather-resistant material.

In the event you have recently acquired a translator station, please make sure you promptly install the proper sign and dismantle any sign that currently exists with references the previous owner of the translator station. And, since these signs are sometimes destroyed by maintenance crews or groundskeepers, or fall apart due to weathering, it would be wise to inspect the condition of each sign once or twice a year.

SELF INSPECTION

By the way, basically the same rules apply to all FM and TV translator and booster stations.

To make sure you are in compliance with all the Rules, please note that the FCC has published Self-Inspection Booklets for FM translator and booster stations as well as TV translator and booster stations. If you do not have a copy of that booklet, just [click here to download](#).

Question: *My translator has had a lot of difficulty in getting a clean signal from the main station. Can I feed my translator using the Internet as a feed?*

Cary Tepper: There is a good deal of confusion in the broadcast industry as to what types of signal delivery methods are permissible for FM translator and booster stations. Long ago the

FCC staff shared with me a handy chart, and it is reproduced here:

<u>Delivery</u>	<u>Satellite</u> (includes all Terrestrial)	<u>All Terrestrial</u> (including microwave & Phone lines)	<u>Off-Air</u> (including intermediate translators)
<u>All Boosters</u>	Yes	Yes	Yes
<u>Fill-in Translators :</u>			
Commercial Translators	No	Yes	Yes
Non-commercial translators (In non-reserved band, or not commonly owned with the Primary Station)	No	Yes	Yes
Non-commercial translators (In reserved band and commonly owned)	Yes	Yes	Yes
<u>Non Fill-in Translators</u>			
Commercial translators	No	No	Yes
Non-commercial translators (In non-reserved band or not commonly owned with	No	No	Yes
Non-commercial translators (On reserved band and commonly owned)	Yes	Yes	Yes



AN INTERNET OPTION?

Based upon the foregoing information, it is permissible for an FM translator station operating in the reserved band to be fed by a broadband Internet connection.

It is also permissible for an FM translator station operating in the reserved band to be fed by a microwave feed.

If you are the licensee of a translator or booster station, please take a moment to check the Rules and Policies outlined in this legal column.

And please do share this information with anyone that is involved with the management or maintenance of any of your translator or booster stations.

Here is your chance to ask question about any FCC Rule or procedure. Just [click here and ask away](#) with no obligation.

Cary Tepper is the founder and managing member of Tepper Law Firm, LLC. Tepper has had, since 1985, an extensive telecommunications law practice with regard to broadcast regulation, business negotiations, acquisitions and mergers, broadcast facility modifications, radio spectrum allocations and administrative hearing litigation. Tepper Law Firm represents several hundred radio and TV stations throughout the United States.

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