

The Alternative Broadcast Inspection Program (ABIP)

updated 11/14/23

The Federal Communication Commission (FCC) is an independent agency of the United States government, created by Congressional statute to regulate interstate communications by radio, television, wire, satellite, and cable in all 50 states, the District of Columbia and U.S. territories.

One of the main tasks of the FCC covers the approval and issuance of licenses to operate all forms of communications that use the RF spectrum. This includes Radio and Television Broadcast.

A set of Rules and Regulations are in place to aid in creating an "even field" for all users. The FCC has a program of random inspections to ensure that users are complying with these rules and regulations. If, during an inspection, should the FCC find areas of non-compliance they can issue a Notice of Liability (NAL) which can result in a substantial monetary fine.

Over the years, this has become a burdensome task for the FCC, given the number of broadcast stations and the limited staff. It was also discovered that a number of the non-compliance issues were not intentional but due to operator oversight or misinterpretation of the rules.

The Alternative Broadcast Inspection Program (ABIP) was created around 1989 to aid the Commission in making sure all broadcast operations are in compliance and to help stations understand the rules in a one-on-one setting. In the beginning, the ABIP inspectors were retired FCC engineers. As the program began to expand around the country, other engineers were recruited and trained by regional FCC inspectors.

Under the program, the FCC enters into a contract with each state broadcasters association to oversee the ABIP. Each state association then hires a qualified engineer to conduct the inspections. The chosen engineer must be approved by the FCC field office serving the area.

The inspections are entirely voluntary on the part of the stations. Those choosing to have their facilities inspected under the ABIP will fill out a request form with their state association. The inspector will then contact the station and set up a date for the inspection. Once the date has been set the inspector will notify (with the approval of the station) the FCC field office for that state. This initiates a 150-day grace period that will eliminate a potential visit by the FCC before the ABIP inspection is completed and any issues corrected.

Once the inspection is completed the ABIP engineer will meet with the station(s) Chief Engineer and Manager to go over any issues that may need to be addressed to ensure the operation is in full compliance.

The inspector will create a written report which will outline any items that need to be addressed, along with the procedure for correction. This report will be sent to the station General Manager and/or the Chief Engineer.

The results of the inspection are completely confidential in that no one will see the report except station management and engineering. Neither the FCC nor the state broadcast association receives a copy. Once the inspector is satisfied with any corrective measures to achieve compliance, a Certificate of Compliance is issued by the state broadcasters association and signed by the inspector, state association President and the Director of the FCC field office. Once the certificate is issued, the FCC will not conduct random inspections of the station for a period of three years. Upon expiration of the three-year Certification of Compliance, the station must be re-inspected if it wishes to have the Certification renewed.

Note, however, the Commission reserves the right to conduct an inspection if they receive a complaint or report concerning safety items (inadequate tower lights or non-compliant painting.)

The station may also be randomly selected for an EEO audit. This normally is done by mail and doesn't result in a personal visit by the FCC inspector.

If the inspection reveals issues that need to be addressed, the station(s) have until the end of a 150-day grace period to bring the station into compliance. The inspector may request photos, copies of documents or even a return visit to ensure compliance.

The ABIP inspection can normally be completed in one day. However, some licensees may have more stations than can be completed, due to logistics, in that time period.

The station engineer should be available to accompany the inspector during inspection. Items that are inspected include:

Public File: (*FCC 73.7526*)

Ascertaining that all documents required by the Commission have been placed in the "Online Public File" (OPIF) on the required dates. The inspector will have a written outline of required documents and proper retention times to aid in the inspection. Normally, a copy of this document is left with the station personnel that maintains the public file. During this part of the inspection, all station authorizations (licenses) are reviewed to assure the information is correct.

Technical Documents:

Review of technical documents that are required to be retained (not part of public file). These include Chief Operator designation, NRSC measurements (AM stations only), quarterly tower light inspection, Antenna Structure Registrations (ASR) and equipment performance measurements.

Note: tower owners that have "robust, continuous" remote monitoring systems connected to a network operations center staffed 24/7 can apply for a waiver of quarterly physical inspections of tower marking and lighting systems.

EAS/CAP Equipment: *(FCC part 11)*

Inspecting the EAS/CAP equipment as to proper operation and monitor assignments and reviewing with engineer the procedure in place for issuing a Required Weekly Test (RWT). Part of this review includes checking the monitor sources, making sure required EAS/CAP alerts and test can be issued even when station is unattended. Stations are also required to maintain a copy of the National EAS handbook along with a copy of their State EAS plan.

Review of the station log: *(FCC 73.1820)*

This log should have listed all dates and times of required EAS/CAP activations. It should also contain information as to proper operation of the tower lights if applicable. The Chief Operator or the alternate Chief Operator of the station(s) is required to review the station log once each week to assure that the require entries have been made. Once reviewed, the chief operator is required to sign and date the log. Station logs are required to be retained for a period of two (2) years.

Review of the station web site: *(FCC 73.2080)*

If a station has a web site, a link to the most recent Equal Employment Opportunity (EEO) file along with a link to the stations "Online Public File" must be posted on the site.

Remote Control operation: *(FCC 73.1350)*

It is required that the personnel designated by the licensee to control the transmitter must have the capability to turn the transmitter off at all times or include an alternate method of taking control of the transmitter which can terminate the station's operation within three (3) minutes. In general, the licensee or permittee must correct any malfunction which could cause interference or turn the transmitter off within three (3) hours of the malfunction. Some malfunctions, however, must be corrected within three (3) minutes.

Transmitter Power Output: *(FCC 73.1580)*

The Transmitter Power Output (TPO) is checked and compared to that listed on the station authorization. AM stations will require reading the antenna current meter at the base of the tower. Alternatively, stations may use a calibrated line meter at a known impedance point (as is the case with directional AM operation).

FM Stations will typically use the indirect method to determine power output. Total Power = Plate Voltage times Plate current times transmitter efficiency.

Television stations are required to have available a means to verify correct transmitter power output, such as an RF power meter.

At an AM transmitter site, the condition of the fence and gate surrounding the tower and/or property is examined. All AM towers are required to have a "locked" fence around the tower structure.

At FM transmitter sites, the inspector should attempt to view the antenna to compare the number of bays to the station's authorization.

Tower Inspection: *(FCC 73.1213)*

The location of the tower structure should be verified against the station's authorization. A GPS device may be used to do so. Observe the paint condition if applicable. Inspector may use a chip chart to check the fading of the color. Proper tower light operation will be verified, along with a review of the monitoring procedures used by the tower owner. Inspector will also review the latest "Quarterly Tower Light System" inspection report.

Antenna Structure Registration:

All tower structures over 199 feet above ground should be registered with the FAA. Once approved, the tower structure will receive an Antenna Structure Registration (ASR) number. This number should be placed on or near the tower itself in a place where it can be easily observed. Inspector will review the ASR to check tower location and ownership.

Maintenance Logs: *(FCC 73.1350)*

While the FCC doesn't mention Station Maintenance logs by name in the rules and regulations, it does require the licensee established procedures and schedules for ensuring the station is operating technically in full compliance with FCC rules and regulations. A maintenance log will be a written record of the required inspections and monitoring.

Directional AM operation:

If the AM station being inspected operates with directional properties, the inspector will visit each monitor point to verify proper operation. Although most directional AM stations are no longer required to make monthly field measurements, they must have or be able to secure a calibrated field strength meter to ensure proper pattern parameters as often as necessary to ensure compliance.

Note: The FCC has approved Method of Moments (MoM) modeling of an AM directional array. This virtually eliminates monitor points, however the precision of the sampling system under the MoM rules is required to be checked every two years.

AM Power and/or Pattern Change:

The inspector will review the procedure for any power or pattern changes that are required by the station authorization. Station(s) must provide a method for verifying that the required changes have taken place as scheduled.

The Alternative Broadcast Inspection Program should not be viewed as just an insurance policy against a visit by the FCC inspector, but as an educational tool. ABIP inspectors are well versed in the interpretation of current and newly enacted rules by the Commission. Should a question arise about a certain rule, the inspector will contact the FCC field office for an updated interpretation.