

Rules, Regulations, Policies, Practices and Operations

V12.0 2017-10-07

Radio Rules!

Handbook of Essential Information

wfpr-fm

Operations – Stuff You Need to Know

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Who We Are

Franklin Community Cable Access, Inc. (FCCA, we/our/us), dba Franklin TV was formed as a 501(c)(3) nonprofit educational organization in 2011. Our Public Access, Education, and Government TV (PEG-TV) charter is in keeping with LPFM community radio service.

FCCA is the parent organization and FCC license holder for WFPR-LP / Franklin Public Radio, a/k/a wfprofm or FPR on 102.9 FM or on the web. wfprofm exists within the legal and organizational structure of FCCA and must operate in keeping with FCCA bylaws. All LPFM guidelines, rules, policies, operations and procedures are determined by FCCA's Executive Director and as necessary, approved by the FCCA Board of Directors through a voting process described in its bylaws. As a non-profit organization, wfprofm trains and oversees volunteers. Funding and support grants are contributed by FCCA and other local businesses, organizations, and individuals throughout the communities we serve.

Franklin is a community that strives to promote a healthy local economy and advance its high ranking among the safest and best of American communities. Franklin enjoys a strong, clear pride of place fostered by the town's many fraternal and volunteer service organizations.

We also reach out to support neighboring communities within our coverage area. Many Franklin businesses employ people who live in these surrounding towns – and vice versa.

FPR programming comes from Franklin residents, FCCA's cable TV programs, and contributed content from neighboring media sources. It's all local, and it's all part of life in Franklin.

Low Power FM – A Movement and Philosophy

The LPFM movement began in 2000 when the Federal Communications Commission issued its first round of radio station construction permits. About 800 of these original LPFM licensees operate to this day. The Commission's purpose was and remains to bring a greater diversity of voices to radio. An LPFM station typically transmits up to 100 Watts of power from an antenna no higher than 100 feet – enough power and height to reach a local audience.

In 2013-15 the FCC issued over 1,000 new LPFM construction permits. Typical applicants are towns, schools, churches, civic groups and PEG-TV centers – all nonprofit organizations.

LPFM radio speaks to the public in ways that commercial stations can't. What are the goings on in the community where you live and work? In your neighborhood? Where can you find nearby help and support? The voices are local – your friends and neighbors. The issues are local as well. If an event is happening on LPFM radio, odds are it's probably happening nearby. LPFM is radio right around the corner and down the street. It's radio that reaches you right where you live. It's your friends and neighbors. It's you. Make it personal. Make it matter. Get involved.

WFPR/Franklin Public Radio – Our Mission Statement

WFPR-LP FM, Franklin Public Radio serves Franklin and its residents as a bully pulpit for the community. FPR's mission writ large is simple: <u>Amplify the Public Good</u> – by publicizing the many positive aspects of Franklin life.

Citizen Support:

FPR offers an open, accessible public forum where citizens educate citizens on significant local issues of the day. Citizen participation, opinion and editorial expression are encouraged.

Pro Bono Support:

We educate and inform our audience about local activities, events, and free support services offered by volunteer groups and nonprofit organizations who serve the public interests of Franklin, its schools and its residents.

Educational Support:

We also spotlight Franklin's local arts, music, cultural, civic and school events while providing volunteers with training and practical experience in media craft and communication arts. Our dedicated FPR studios are co-located in our Franklin TV Public Access studios.

Government Support:

Franklin's local government is a model of openness and accessibility. We provide regular coverage of government meetings, and publicize government notices and activities. We provide a ready forum for informing and educating the public on issues of civic importance to Franklin and neighboring towns. Candidates for local offices are afforded equal, ample access.

Public Safety Support:

Additionally, FPR works with Franklin's Fire, Police and Emergency Management Authorities. We provide direct, secure, on-demand access for Franklin's Emergency Management Centers to convey timely information over the air as a public safety radio service to protect life, health and property as emergency or adverse circumstances may warrant.

PEG TV Support:

WFPR-LP (and wfpr•fm on the web) serves as an outreach of Franklin•TV and our neighbor PEG TV studios. We promote greater public access by extending the reach of our local PEG cable programs to the FM airwaves. Interviews, talk shows, Op-Eds, music programs and other content produced by PEG facilities can translate well to radio. Franklin•TV and PEG studios in neighboring towns within FPR's service area all enjoy a larger public voice.

About This Handbook

Welcome to WFPR-LP, Franklin, MA, 102.9 FM and the world of local community radio.

We're also commonly identified as wfprofm, FPR, Franklin Public Radio or Franklin Radio.

This handbook provides essential information that forms the legal and operational framework for Franklin Public Radio. Having received a copy of this handbook, you must thoroughly review, understand, and adhere to its rules and guidelines. Since **wfprofm** is owned and operated by FCCA, Inc. dba **FranklinoTV**, all members also must adhere to all **FranklinoTV** policies in addition to those described herein. Strict adherence to our policies and practices as well as FCC rules is necessary to maintain our broadcast license and insure our continued operation.

We are entrusted by the FCC with a public resource, our FM channel. Our principles and policies are based on sound business, production and broadcast practices that strive to maintain the highest professionalism both on and off the air. How our audiences perceive other Franklin organizations whose good works we support is determined in part by how they perceive wfprofm; who we are; what we stand for; how consistently professional we sound, and how we present ourselves in public.

Our core principles demand that every member of our organization consistently:

- Treat everyone with respect, fairness, and dignity.
- Encourage creativity and personal development.

This handbook describes the rights, privileges and responsibilities of everyone involved in FPR's operations. It is written for staff and volunteers alike (member(s) you/your). In some sections, employees, staff, volunteer(s), or host(s) and guest(s) may be referenced more specifically. Procedures and practices outlined in this book may be updated from time to time as necessary. This book and related documents are available for download on our website, wfprofm. If you need clarification or additional information about any material in this handbook, or if you have suggestions for additions or improvements, please contact a manager.

Franklin Public Radio, wfprofm 23 Hutchinson St. Franklin, MA 02038

508-528-WFPR (528-9377)

www.wfprofm

info@wfprofm

The Organizations

The FPR organizational/operational structure looks like this:
FCCA Board of Directors & Officers
FCCA Executive Director
WFPR-LP Station Manager
Facility Manager & Chief Operator
Program Director
Staff & Volunteer Members

Franklin Community Cable Access ~ Board of Directors

FCCA is the legal holder of the FCC license, and the primary source of funding for **wfprofm**. Its seven-member Board of Directors oversees all activities of FCCA, including **wfprofm**, which operates wholly as a subsidiary under FCCA's PEG service agreement with Franklin, MA and its corporate charter as a 501(c)(3) charitable educational organization.

FCCA Executive Director

The FCCA Executive Director directs mission and planning, and manages day-to-day operations of both Franklin TV and wfprofm and reports to the FCCA Board of Directors.

FPR Station Manager

The Station Manager oversees all day-to-day operations at the station. He/she ensures that the station is in full compliance with rules and regulations of the FCC and other governing bodies at all times and operates consistently in accordance with wfprofm's mission.

FPR Facility Manager and Chief Operator

The Chief Operator ensures that all station equipment operates effectively, legally and correctly. All malfunctions or problems with studio, transmission or monitoring equipment should be reported to him/her. The Chief Operator is also responsible for maintaining the station's logs.

Program Director

The Program Director oversees on-air programs and production projects. He/she is responsible for evaluating the quality and entertainment value of programs. If the Program Director determines that a program is not effective or appropriate on air, or needs changes, the program's producer(s) may make recommended changes per the Program Director. The Program Director, in consultation with the Station Manager, determines the wfprofm programming schedule.

Members, Volunteers

As a non-commercial outreach project of a non-profit organization **wfprofm** relies on volunteers. Anyone who wishes to actively participate in supporting community radio can become a volunteer/member. Program producers must understand and meet certain technical requirements. The majority of **wfprofm** programs are the product of the knowledge, hard work, and creativity of our staff and volunteers. In addition, volunteers contribute their experience, skills and efforts to support many off-air tasks and day-to-day operations.

What makes a radio station tick? Here's an overview of typical roles common to LPFM stations. Staff and/or volunteer members often combine and fulfill multiple roles.

OPERATIONAL ROLES:

Station Manager

Oversees all day-to-day activities and serves as a spokesperson for FPR. Directs staff, member volunteers, business and technical operations. Resolves issues. Insures compliance with FCC regulations. Takes direction from and reports to Board of Directors. (6 hours a week).

Operations & Technical Manager (Chief Operator)

Maintains facilities, broadcast and production equipment at the studio, and equipment at the transmitter site. Is also responsible for upkeep of FCC required logs.

Office Manager

Maintains office equipment and supplies, ensures adequate inventories of forms, collateral and broadcast calendars. Checks and conveys phone messages. Also assists the Station Manager as needed. (2-3 hours a week).

PROGRAMMING ROLES:

Program Director

Oversees all aspects of programming and the efforts of volunteers. Acquires recordings and organizes the music library for access by genre. Maintains all forms of media in the library. *On-Air Traffic Manager*

Schedules funding announcements, promos, PSA's, community and other messages into the Program Log. Creates and maintains on-air public service announcements (PSAs). Gathers information for local announcements from various sources including websites, newspapers, flyers, notices, community members and service groups of interest to listeners.

Public Affairs Director

Monitors and collects information from the community as it relates to public affairs and issues. This information is then incorporated into the station's programming.

FINANCIAL SUPPORT ROLES:

Underwriting Manager

Develops funding sources and manages the accounts of businesses and individuals as sustaining supporters that underwrite ongoing operations and programming. Writes and schedules on-air underwriter acknowledgements that are then scheduled into rotation by the Traffic Manager.

Fundraising Manager

Manages fundraising activities, public events and outreach to raise money for various projects and ongoing expenses of the station.

Membership Coordinator

Develops database of listener supporters (i.e., members). Maintains account records, prepares mailers, membership cards and premiums. Works with the Program Director to oversee on-air membership campaigns. Manages the production and publication of a Quarterly Listener Guide. *Promotion, Public Relations & Events Coordinator*

Coordinates station presence at key community events. Oversees activities, projects and events that promote station visibility in the community.



United States of America FEDERAL COMMUNICATIONS COMMISSION LOW POWER FM STATION LICENSE

Official Mailing Address:

FRANKLIN COMMUNITY CABLE ACCESS, INC.

23 HUTCHINSON ST

FRANKLIN MA 02038

Facility Id: 194829 Call Sign: WFPR-LP

License File Number: BLL-20170208AIB

This authorization re-issued to reflect

Authorizing Official:

Nazifa_Sawez

Assistant Chief Audio Division

Media Bureau

Grant Date: February 16, 2017

This license expires 3:00 a.m. local time, April 01, 2022.

Subject to the provisions of the Communications Act of 1934, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this license, the licensee is hereby authorized to use and operate the radio transmitting apparatus herein described.

This license is issued on the licensee's representation that the statements contained in licensee's application are true and that the undertakings therein contained so far as they are consistent herewith, will be carried out in good faith. The licensee shall, during the term of this license, render such broadcasting service as will serve the public interest, convenience, or necessity to the full extent of the privileges herein conferred.

This licen station no license be herein. Ne assigned o of 1934. T Government Communicat



FCC Form 351B O

FCC & Legal Stuff

Liability Waiver Form – "Hold Harmless"

It is important to note that as a member of FPR, you are *primarily and solely responsible* for all content in the programming that you produce, whether live or recorded, including what your guests say. Completing and signing the liability waiver and release at the end of this handbook is a condition of membership. When you submit a completed form to FPR, and can demonstrate proper operating knowledge and skills, then you may be certified for on-air operation.

FCC Regulations for On-Air Conduct:

wfprofm is licensed by the Federal Communications Commission (FCC), the agency that oversees channel allocations, technical compliance, and programming requirements for all broadcast stations. We have been granted the use of a publicly owned, scarce natural resource – a slice of the electromagnetic spectrum – as a radio channel. We are the privileged stewards of this valued franchise, and must operate per FCC rules, regulations and its broadcasting mandate, "in the public interest, convenience and necessity".

All involved with FPR must adhere to FCC regulations, including, but not limited to political broadcasting, news distortion, libelous and slanderous statements, as well as all areas further described in the FCC regulation section of this handbook. If **wfprofm** is to avoid potential FCC fines and civil suits and remain on the air, it is imperative that our members comply with FCC rules and regulations at all times. A reference copy of relevant FCC Regulations for FM, LPFM and general broadcast stations is maintained in our studio files.

Members found to be in violation of any FCC regulation will be subject to disciplinary action up to and including loss of membership. Members who knowingly violate FCC regulations will be subject to immediate loss of membership. A broader explanation of FCC regulations and policy can be found in *The Public and Broadcasting* (July 2008), available online and in the studio.

Live Operations – Required Training and Certification:

Almost all of our programming schedule at **wfprofm** is prerecorded and/or originated by our automation system. Our live programming is minimal and occasioned only by timely necessity. Live operations must be conducted by a trained member familiar with the studio equipment and real-time technical operations required for live broadcasting. In order to participate in **wfprofm** on-air operations, be they live or prerecorded, a member must demonstrate competency in studio control and audio production techniques and have the approval of the Station Manager.

During live operations the most important aspect of any radio station is what goes over the air, and at any moment the most important person is the on-air operator/announcer. Every on-air operator is required to understand and comply with all FCC rules and regulations that apply to wfprofm. All members must undergo training and demonstrate to the Station Manager that they fully understand the rules and procedures required for broadcasting.

In 1996, the FCC eliminated its requirement for individuals operating a radio station to hold a Class III FCC Radio Operator Permit. Today, stations must insure that their on-air operators are both FCC compliant and competent. Thus, we at **wfprofm** are responsible for certifying our broadcasters. We acknowledge the FCC Class III Operator Permit as proof of FCC compliance. However, to insure that volunteer members are capable of operating our equipment, we maintain a training and certification program. To be certified for operations you must be trained on the use of equipment by a certified, experienced member and have completed a training checklist.

You must understand technical standards for audio and how to operate various recording and playback systems, mixing consoles, and be able to demonstrate proper microphone technique. After this essential skills training you must have an on-air operator sit in with you during your first in-studio program to confirm your proficiency in equipment operation, announcements and maintaining FCC required logs. All on-air operators must timely maintain the Program Log at all times when operating the station.

Members are also encouraged to develop related broadcast craft, such as writing, performance, or audio production, and to seek guidance from others at **wfprofm** to learn the appropriate skills.

On-Air Conduct & Signed-In Operator Responsibilities:

When you are the signed-in operator you are responsible for all that happens in the studio and on the air as well as for specific procedures, logging in/out and identifying the station at specific times. Some responsibilities and requirements have to do with the safety of station and equipment as well as compliance with our broadcast license. Other responsibilities have to do with upholding our stated purpose as an organization.

As the signed-in on-air operator you are responsible for the following:

- A legal station identification at the top of every hour.
- Maintain logs for board operators, guests and others as appropriate.
- All on-air conduct and material broadcast during your schedule.
- The security of wfprofm equipment and library files.



Programming Regulations

Legal Station Identification:

The FCC requires all radio stations to identify themselves at the following times: At the start and end of each period of broadcast operation (sign-on and sign-off). Hourly, as close to the hour as possible, at a natural break in program offerings.

All on-air members are expected to air a recorded *Legal Station Identification* (ID) once per hour, within five minutes before or after the top of the hour. The recorded IDs insure FCC compliance and help to promote the image of the station as a community of many voices. Members may record personal Legal ID announcements for use on their own programs. Such announcements, however, must meet FCC standards and be approved by the Program Director.

A legal station identification shall consist of the station's complete call letters: WFPR-LP, followed by the community (Franklin) specified as the station's city of license. Optionally, the name of the licensee (Franklin (Public) Radio) or the station's frequency (102.9 FM), or both may be inserted between the call letters and the station location. No other insertion is permissible. Similar related follow-on statements are permissible.

The exact minimal wording of a Legal ID is our call sign and city of license:

• "This is W F P R - L P, Franklin."

Optional additional statements:

- "You're listening to **W F P R L P**, 102.9 FM, **Franklin**." (legal) Follow-on options:
 - Franklin Public Radio is made possible by good folks just like you, & Franklin TV.
 - Thanks for listening to FPR and thanks for watching (Franklin TV).
 - You can enjoy local Franklin programs anytime, anywhere.
 - Visit our websites wfpr dot fm or Franklin dot TV.

Casually spoken ID variations at other times as, "FPR, Franklin Radio", etc. are permissible, provided a legal ID is broadcast near the top of each hour.

Public Service Announcements:

As part of **wfprofm**'s commitment to public service, we air public service announcements (PSA's). To be considered a PSA, the message must be on behalf of a nonprofit, tax-exempt organization or established pro-bono volunteer service group. Local PSAs should be sent to:

• psa@wfprofm, a minimum of three weeks in advance of any dated event.

The Program Director will assemble and update a PSA script book located in the on-air studio. FPR program policy does not permit members to add or remove PSAs from the book or to accept PSAs over the telephone. Volunteer members who wish to add a PSA should submit it to the Program Director for approval. PSA scripts containing dates for events that have transpired should be returned to the Program Director.

Prohibited or Regulated Messages and Announcements:

Promotional Endorsements:

wfpr•fm on-air members (you) may read announcements – but not endorsements – for local concerts and community events.

Specific prohibitions regarding promotional announcements include the following:

- You may not encourage listeners to patronize any particular place of business.
- You may not promote the sale of goods/services except those offered by WFPR.
- You may not announce personal items.
- You may not promote events in which they have financial interest.
- You may not announce prices for events or services on-air.

Prohibited promotion includes doing a special feature, an extended music set, or a whole show on an artist or artists who will be performing at a for-profit concert or event, then announcing something like "You've got to see this show.", or, "This'll be the best Halloween Party in town", and other supportive comments, however casual.

However, when answering the phone (not for airplay), you may provide event information that cannot be broadcast, including pricing and opinions about events.

You may mention that an event involves a fee or suggested donation, but you may not specify the amount unless the event is offered free of charge.

Note: price may be mentioned only in announcements that promote our own fundraising events that are sponsored by and solely benefitting wfprofm.

wfprofm Promotional Announcements:

You may be asked to air promotional announcements for FPR activities and events. Prerecorded announcements may be scheduled for play during each program shift. All station promotional material must be approved by the Program Director prior to airing.

You are encouraged to produce promotional announcements for upcoming shows and specials in coordination with other FPR personnel.

Program Content:

Rights and Limits of Free Speech:

There have been several Supreme Court cases that have determined that, unlike individuals and by extension newspapers, the right to free speech for radio stations can be limited by regulation.

Since radio spectrum is regarded as a *scarce national resource*, all radio stations are regulated by the federal government – specifically by the Code of Federal Regulations (CFR). The agency charged with that regulation, the Federal Communications Commission, may also regulate via "Report & Orders" in addition to the CFR. Radio stations are also subject to regulation by the IRS, especially non-commercial/educational stations, and thus we must adhere to various rules governing not-for-profit (non-profit) organizations.

The FCC regulates content on radio stations – *in the public interest, convenience and necessity*. In short, the public (our audience) owns the airwaves, and the FCC grants a franchise – a license. The FCC represents the public interest. Conversely, radio stations cannot have their editorial content constrained or regulated *absent good reason*. Libel, slander, false claims, payola/plugola are just a few reasons for such regulation. However, in today's more politically correct climate, perhaps the most well-known content regulation is indecency, obscenity and profanity.

Free Speech v. Programming Policy Violations:

You cannot rely on what you might regard as personally offensive to be a governing determinant. Your personal taste doesn't govern. The FCC applies *local contemporary community standards*. This can mean that if just one listener is offended, it could mean punitive fines or even the loss of our FCC license, or civil penalties levied against the station, its management, and yourself. Note that legal defenses are very costly, even if you are found not guilty.

Partisan, Political and Editorial Speech:

The FCC's rule on political editorializing is: if a broadcaster runs an editorial or commentary either supporting or opposing a candidate for public office, within 24 hours of the editorial or commentary, the station must contact all candidates for that office. If a station opposes a candidate, that candidate must be given a reasonable opportunity to respond. If a station supports a candidate in a race, then all legally qualified opposing candidates must be notified and given reasonable opportunity to respond. Stations must inform candidates that they may select a spokesperson to present their response in order to conform to "equal opportunity" regulation.

When a political representative or candidate or anyone conveying a viewpoint on a political issue is provided air time on any program, a statement must be read at the end of the program inviting rebuttal viewpoints from representatives of other political parties or candidates. If you plan to interview a guest who is a current candidate for public office (or if you wish to become a candidate) talk to management prior to your broadcast. The FCC also has specific record-keeping requirements.

Because of FCCA's non-profit status, it is governed by IRS regulations that further limit partisan political activity. Therefore, it is FPR policy not to endorse candidates for political office or specific legislation. Members must refrain from any form of on-air endorsement.

Political, Editorial Disclaimer:

Editorial content presented on **wfprofm** must be consistent with our mission and reviewed in advance by the management. You may express your own opinions on the air, but if you choose to do so, you must provide a disclaimer at the start and end of your program. When discussing sensitive or controversial topics, or when guests (or you) are expressing personal opinions, it is your responsibility as the on-air presenter to make clear to listeners that the opinions expressed are yours or those of your guests and not the opinions of **wfprofm**.

An example statement:

"The views and opinions expressed during (program name) are solely those of the participants and do not necessarily reflect the views of **wfprofm**, its staff, management or underwriters."

Public Affairs Programming and Logs:

The FCC requires that a list of public affairs programs be maintained in the station's Public File. All producers of public affairs programs must provide necessary information on a timely basis.

Religious Speech:

FPR generally supports programs and discussions on matters of religion, faith, and spirituality on air, provided these are conducted in a spirit of free and open inquiry, diversity, inclusion, and are free of derision or coercion.

Recordings or Broadcasts of Telephone Conversations:

The FCC requires that any person(s) speaking on the telephone must be advised in advance that the call will be broadcast on the air or recorded for later broadcast. Providing prior notification and obtaining informed consent is required. Prior notification and consent is not necessary when someone calls a program's publicized talk line number expressly to participate in a live call-in talk show that regularly broadcasts telephone conversations.

Recommended practice: Inform the person(s) speaking on the telephone of the station's intent to broadcast/record the call and obtain consent. Begin recording, and again remind all parties that the call is now being recorded with their consent. That consent is now a matter of record.

Broadcasting and Copyright Law

It is not legal to re-broadcast any prior or live broadcast or programming of another radio or TV station, either simultaneously or delayed, without express written permission from the originating station. Copyright laws also apply to the on-air reading of copyrighted printed material. On-air members are permitted to make "fair use" of copyrighted material in reading or quoting from it on the air, but are not permitted to read or quote at length without the express, written permission of the copyright holder. As a general rule, before reading copyrighted material on the air, consider whether doing so could reasonably interfere with, limit or diminish the copyright holder's ability to sell the material in FPR's broadcast area.

It is not legal to broadcast bootlegged or other non-commercial recordings of performances without express permission of the artist. It is not legal to offer recordings for free or fee unless the person making the offer owns the copyright(s) or has written permission from the copyright holder(s). No member owns an exclusive copyright to material produced at FPR unless he/she has obtained a written, signed agreement with FPR. If you have questions about copyright, consult a manager. In general, it is legal to broadcast any material that has been commercially recorded, including music and spoken word recordings, except when otherwise indicated on the recording. However, although playing commercially recorded music is legal, it's not free.

Any violation of FPR copyright policy is grounds for dismissal. Moreover, any resulting fines or legal actions resulting from infringement are the sole responsibility of the individual member.

Music Publishing and Performance Rights Organizations (PROs):

PROs are organizations that collect royalty income for songwriters, composers and publishers whenever a song is publicly performed at a club or restaurant, at a concert, or is broadcast on television, AM/FM airwaves, via internet radio services like Pandora, or publicly broadcast in some other fashion. The performing venues and broadcast stations pay fees to PROs, who in turn compensate the registered songwriters and copyright holders.

ASCAP, The American Society of Composers Authors and Publishers, is an association of over 190,000 songwriters, music composers and publishers. BMI, Broadcast Music, Inc., represents more than 300,000 songwriters, music composers and publishers. SESAC, Society of European Stage Authors and Composers, licenses the public performances of more than 400,000 songs on behalf of its 30,000 affiliated songwriters, music composers and publishers.

FPR pays licensing fees to ASCAP/BMI/SESAC. These fees are only for broadcast airplay, and do not permit the unlawful copying of music from FPR's library.

As ASCAP/BMI/SESAC represents songwriters, composers and publishers, Sound Exchange is an independent nonprofit performance rights organization that collects digital performance royalties for its recording artists and musicians, recorded master rights owners and record labels. Broadcast rights fees to Sound Exchange are a subject of ongoing legislation and court actions.

Fundraising, Sponsorship and Underwriting Support

FPR accepts underwriting support from foundations, businesses and donors. Underwriting is unique to non-commercial/educational stations. In 1982 Congress permitted non-commercial radio stations to broadcast limited underwriting acknowledgements. Businesses may underwrite programming and receive on-air acknowledgements of their support, but the law does not allow commercial advertising. While underwriting can serve the same purpose as advertising, it differs in important ways. Unlike commercials where most anything can be said, underwriting has FCC restrictions to prevent programming of non-profit stations from becoming too commercialized.

Underwriting Restrictions:

A donor/sponsor acknowledgement is an underwriting message. It is more limited in language and broadcast usage than a commercial or spot announcement. The FCC outlines five specific practices that promote a business commercially rather than identify, and therefore are not allowed on non-commercial stations: calls to action and inducements to buy, sell, rent or lease, comparative descriptions, qualitative descriptions, price information.

Call to Action:

Most calls to action contain imperative language directing the listener to take action, such as urging listeners to buy a product/service, or call, or go to a business, concert or performance.

"Visit your local branch office. Call today for more information."

"Stop in, shop here, call, call now, mention WFPR."

The FCC has indicated that a phone number or website may be part of an underwriter's message. However, it must not be stated as part of a call to action.

"Call us at 555-2222 for more information".

Inducement to Buy, Sell, Rent, or Lease:

Announcements containing any inducement to buy, sell, rent or lease are not allowed. Language that encourages doing business with the underwriter is inherently commercial. Any specific short term activity, even for businesses which regularly engage in nothing but short term activities, is considered an inducement.

"...six months free service, now offering free checking, limited time only", etc.

Comparative Description:

Acknowledgments that compare an underwriter's products descriptively to competitors are not allowed. Comparative language, explicit or implied, draws a comparison to other businesses, "best, better, more, the best place in town, the biggest car dealer, the greatest tasting pizza ever". The relevant test is not about fact or truth, but whether a statement compares the underwriter's product or service with competitor. A statement can be true yet still be comparative and therefore deemed promotional and thus, is disallowed.

Qualitative Language:

Acknowledgments that contain qualitative descriptions of products or services are not permitted. Qualitative descriptions include features, benefits, advantages or other qualities offered by the underwriter's products or services (fine, excellent, tasty, good). Again, the truth is not at issue. Qualitative language serves to promote rather than identify. Promotion of a product or service

may be defined as describing it in a superlative manner, "superior, largest selection, newest model, finest selection, state of the art, etc." Personal endorsement, even if true, "We tried it and it was excellent!" Informing how or where to buy a product or service; or any other such encouragement to buy or use a product or service.

Pricing Information:

Pricing information is not allowed unless the offer is free. This includes information on interest rates or other indications of savings or value associated with the offering.

"Free, sale, discount, clearance, reduced, half-off, going out of business sale, and liquidation."

There are also these additional rules:

- The organization providing the consideration must be clearly, directly identified.
- Organizations cannot make donations on behalf of other entities.

Example: a non-profit donating on behalf of a for-profit (to get around some provisions of the underwriting rules).

Underwriter messages are scheduled in the Program Log to run throughout the day, and may include information which identifies, but does not promote the underwriter, including:

- Sponsor name, brand and trade names, and product or service listings.
- Value-neutral descriptions of a product or service.
- Location(s), phone number, web address, E-mail address
- Within limits, a well-defined slogan or logogram, i.e. "like a good neighbor –"

The following are typical underwriting announcements:

"Support for WFPR comes from generous listeners like you, and from:

The Shire Book Shop, 350 South Union Street in Franklin. 508-528-5665 and on the web at shirebookshop.com. "Sharing and caring about books." Our thanks to Shire Book Shop."

"WFPR programs are made possible in part through the generous support of listeners like you - and by Dean Bank – Located at 21 Main St., Franklin with branches in Blackstone, Bellingham and Mendon – and online at Deanbank.com. Dean Bank – celebrating 125 years of dedicated, personal service. WFPR thanks Dean Bank for their continuing support."

All underwriting announcements are prepared free of charge. These are 10 to 30 seconds in length based on the level of sponsorship. The FCC has not declared how long an underwriting message can be. However, they are on record as noting that they cannot see how a message longer than 30 seconds could not be promotional, and thus is against the rules.

The underwriter's donation, also known as *consideration*, can take any form: cash, check, credit card, barter/trade for items or services, free tickets to events, outside promotion, etc. Most often the consideration is simply a check paid in response to an FPR invoice. However, it can become murky when the consideration takes other forms. Such in-kind consideration must benefit the radio station and not any individual.

Example: FPR could accept free concert tickets as donated consideration for underwriting. In such case, underwriting rules apply, and there are a number of things we can't say on air about the event. No calls to action, "Come out and see them in action!" No qualitative statements, "This will be a great show!" This doesn't mean that FPR can't accept concert tickets and still talk about the event. It just means very strict rules apply regarding permitted language.

Also problematic are affiliate programs with for-profit websites, such as Amazon.com Affiliates. The difficulty is that a for-profit entity is benefitting along with FPR. By default, there is some consideration, and thus, underwriting message restrictions apply.

Accordingly, FPR cannot say something like:

"If you're holiday shopping at Amazon.com this season, start at **wfprofm** first, and click on our Amazon Affiliates logo. It won't cost you more, and part of your purchase helps to support FPR. That's **wfprofm**, and click on "Amazon Affiliate".

That language is loaded with forbidden content in the calls to action, price information, and inducements to buy/sell/lease.

What is safe language? One that has limited advertising efficacy, but is still useful: Support for FPR is provided in part by you and our Amazon dot com Affiliate program. More information (details) can be found (are available) at (our website), wfprofm.

Note that there's no mention of the key point – that listeners who shop at Amazon by going to **wfprofm** first can donate part of their purchase total to FPR. The idea is that listeners pick up on the nuance and go to our website. The website can then provide links and details.

Visit this FCC website for more information: http://www.fcc.gov/mb/audio/nature.html#ENHANCED

There are many philosophical arguments about commercial sponsorships and any impact they may or may not have on editorial independence, and we take care to create "firewalls" between content creation and commercial sponsorship. However, the bottom line is that our license holder, FCCA, has explicitly authorized us and encourages us to pursue underwriting. Realistically, underwriting is a necessary part of our overall budget.

Almost all underwriting messages are scheduled for automatic playback at specific times from pre-recorded files. This insures message quality and consistency on our part. On-air members must play and log all underwriting announcements during their air shift.

Not airing an underwriting message means that FPR has to make the contributing sponsor whole (a "make-good"). Missed messages can make a sponsor less likely to continue supporting us. It also hurts our reputation with other prospective sponsors. Failing to air underwriting messages timely and properly during live operation is grounds for dismissal.

Any member who receives comments or questions regarding FPR's underwriting policy should refer them to the Station Manager.

Fundraising – Some Talking Points

Why underwrite FPR Programming?

Your support for local non-commercial radio is valued by our listeners. Unlike the commercial advertising that many listeners ignore, underwriting announcements on community radio stations are noticed, remembered – and appreciated. The community supports businesses that support the local community!

How can underwriting benefit your business?

Community radio is an excellent public relations tool. Underwriting announcements project a strong positive business image by demonstrating support for local community information, arts and culture. Underwriting announcements let listeners know that a business chose to support their radio station and their community. Announcements can generate positive awareness for new businesses or remind listeners that an established business is part of, and committed to the Franklin community.

Expand awareness of your name brand and presence!

Awareness of your business expands each time you are mentioned on community radio. With our diverse program offerings, we reach more types of listeners than any single format station! FPR has something for everyone. We reach listeners with diverse and eclectic sophistication. These listeners are often hard to reach through commercial media. They appreciate useful information over commercial hype. Supporting local non-profit radio conveys a positive message of community commitment and caring.

The only exemption to the limited underwriting language is direct fundraising for the station:

Fund Drive Now! It's FPR's annual fund drive.

Franklin Public Radio needs your support. Our fund drive goal is to raise the entire annual budget to keep us going for the next year. That's an ambitious \$30,000. For this drive we are reaching out – calling and contacting generous supporters who have helped us in the past.

Please respond generously to our call if you donated to FPR during our last fund drive.

Of course, we also appreciate donations from people who haven't donated before. So, join us, won't you? Just go to our website: wfprofm to support FPR now!

Very Bad Stuff

Broadcast Hoaxes:

Broadcasting false information concerning a crime or a catastrophe violates the FCC's rules if:

- The broadcaster knew the information was false.
- Broadcasting false information directly caused substantial public harm.
- It was foreseeable that the false information could cause substantial public harm. (from FCC publication, The Public and Broadcasting, June 2008)

https://en.wikipedia.org/wiki/Great_Blue_Hill_eruption_prank

In 1980, Channel 7, Boston, then WNAC-TV, chose to celebrate April Fool's Day by airing a fake story in its newscast. The news reporter stated that Blue Hill, located south of Boston, had suddenly erupted as a volcano. Archive film of volcanic activity was also shown. Panic ensued among viewers living near Blue Hill. People all over the greater Boston area made frantic calls to check on relatives. Police, fire and 911 emergency lines were overloaded. Real emergency calls could not get through. The newscast's executive producer was fired.

This event was the broadcast equivalent of yelling "Fire!" in a crowded theater. It's illegal.

https://en.wikipedia.org/wiki/The_War_of_the_Worlds_(radio_drama)

The 1938 program that prompted FCC hoax regulation was a Halloween broadcast on CBS radio, *War of the Worlds* by Orson Wells and the Mercury Theatre of the Air. Music by Ramon Raquello's Orchestra was randomly interrupted by urgent (false) news flashes. Listeners truly believed that Earth was under attack by Martians. The nationwide panic that ensued speaks to the credibility, authority, and great responsibility of radio. If you wish to create a radio drama that contains scripted news reports or interviews that might mislead listeners, talk to a manager.

Clear and Present Danger:

Although the FCC has determined that enforcement should be performed by appropriate law enforcement authorities and not the FCC, any speech that is (1) intended to incite or provoke dangerous activity; and (2) likely to succeed in achieving that result, is prohibited. This applies to advocacy of using force, violence, or acting in violation of the law.

Ad Hominem or Personal Attacks:

On-air members should avoid any personal attacks. The FCC's personal attack rule is: if a broadcaster attacks the "honesty, character, or integrity" of an identified person or group while discussing a controversial issue of public importance, then the broadcaster must contact that person or group within a week, provide a script, recording, or accurate summary of the attack, and offer a reasonable opportunity to respond over the same station without charge. The FCC interprets the "personal" element of the rule strictly; attacks or negative comments based on provable fact or public record and not made on personal character do not count.

On-air members must not defame individuals. FPR holds personally liable any member who defames (as defined by law) another individual. Liability includes, but is not limited to, any related expenses, charges, or fines. FPR may pursue legal remedies.

Libel and Slander:

In simplest terms, libel/slander is the knowing, negligent, and/or unguarded broadcast of false information that harms the reputation of, or causes shame or ridicule for, an individual, alive or dead, or organization in a way that causes actual injury in the form of financial loss, impairment of reputation, public scorn, or mental anguish and suffering. Libel/Slander is a violation of State and Federal law. We are liable not only for things we say, but also things that are said by guests on our airwaves. Saying something that even approaches libel/slander can result in a long court battle. Err on the side of caution.

Hate Speech and Sensitivity:

We take seriously our mission to promote access for all voices as well as our responsibilities as a community organization. Speech intended to hurt or intimidate any individual or group, or incite violence is considered hate speech. Broadcasting hate speech undermines our mission and compromises our community's trust in us. Don't do it.

Beyond the issue of hate there are broader issues of sensitivity. We ask that you be sensitive to different listeners in our community. It is not uncommon for underrepresented or marginalized groups to be portrayed unfairly in the media. What you may consider funny or idiosyncratic about a group is often not funny and perhaps even offensive to that group. Please try to imagine being in the shoes of others; how you might feel on the receiving end, and behave accordingly.

Members may not use, nor allow guests or callers to use offensive language or hate speech on the air. If a guest or caller uses offensive language, the program host must issue an immediate warning. Upon a second occurrence, the host must cut the guest or caller off. On-air members must use prudent judgment regarding language that may be offensive. Pre-recorded offensive language or materials must be reviewed in advance by the Program Director or Station Manager.

Harassment, Sexism, and Racism:

While more limited than true hate speech, the effects on our operation can be equally damaging. Sexual harassment is defined as abuse or mistreatment of a person based on his or her gender. This includes sexual assault, defined as any form of sexual contact, and rape without consent. Such actions as cat calls, obscene phone calls, obscene gestures, and other unwanted and/or threatening written or oral communication are also considered harassment.

Racial harassment is any action on the part of an individual or group that demeans or abuses another individual or group because of racial or ethnic background, and/or that creates an intimidating, humiliating, or hostile environment. Such actions may include, but are not limited to, using racial or ethnic epithets, making racially or ethnically derogatory remarks, using racial or ethnic stereotypes, or using images or symbols that are racially or ethnically offensive.

We strictly forbid broadcasting any material that crosses these lines, be it recorded material or live speech of announcers or guests. This is especially true of all comedy material. Examples would be material deemed homophobic, sexually explicit material that degrades or advocates violence towards gender or racial groups, etc. This is just as important as indecency, considering the public reach of radio, and violation of this policy will be treated the same as indecency.

Vulgarity, Indecency, Obscenity and Profanity:

Vulgarity:

Language characterized by a lack of polite manners, breeding or taste. An indecent, obscene, crude, or lewd statement, gesture or work lacking in aesthetic value or charm; a vulgar image.

Vulgarities per se may not definitively violate FCC regulations. However, they are at the murky subjective edge of *local contemporary community standards*. Vulgar language can generate listener complaints, and such complaints can result in fines and legal defense costs.

Indecency:

The FCC defines indecent content as language or material that depicts or describes in terms patently offensive as measured by contemporary community standards for the broadcast medium, sexual or excretory activities or body parts. Although the FCC does allow indecent content to be aired between 10pm and 6am, it may be subject to an enforcement action by the FCC. Thus, it is strict FPR policy that indecent content/material should not be aired.

Obscenity:

Obscenity is prohibited by the FCC and related case law. The FCC bans the broadcast of obscene content at all times. The FCC regards the following criteria as obscene:

- The average person finds the content lewd by contemporary community standards.
- It describes sexual conduct in an offensive way.
- The content lacks serious literary, artistic, political, social or scientific merit.

Again, in sum, content is deemed to be obscene if it appeals primarily to the prurient interest, depicts or describes sexual conduct in terms that are obviously offensive and, when taken as a whole, lacks literary, artistic, political, social, or scientific merit. While these guidelines are subjective, it is FPR policy not to push or test the FCC's determination of boundaries.

Profanity: The *Dirty Words* that should never be broadcast:

When it comes to indecency and obscenity, there is no definitive rule about what language is safe and what is not. However, the infamous *Seven Dirty Words* in George Carlin's classic comedy bit (and a Supreme Court case: FCC v Pacifica Radio, 1978) are a descriptive starting point.

These words and their variations must NEVER be heard on the wfprofm airwaves: Shit, Piss, Fuck, Cunt, Cocksucker, Motherfucker and Tits

Guidelines have broadened to also include words such as:

Fart, Turd, Twat and many other synonyms.

These and many other *perceptually vulgar, indecent, obscene or profane* words should never be spoken into a microphone, nor played from a recording. Bottom line: such language should never be broadcast. On-Air staff and volunteer members are expected to abide by this policy at all times and *err on the side of caution and polite decorum* in keeping with our public image. Our policy on obscenity and indecency adheres strictly to all FCC regulations.

In Sum:

All complaints received regarding controversial or offensive language or material must be taken seriously; reported to a manager and fully documented.

Penalties can be quite severe, and are determined at the federal level by the FCC or the courts.

"I didn't know the song said that."

"Didn't really mean to say that. It just slipped out."

"It was just that one time. I meant it to be funny. I thought it would be okay."

There are no excuses with the FCC.

In short, breaking one of these rules will not only create problems for **wfprofm**, they could lead to legal problems for you as an individual. FPR cannot afford huge fines that the FCC levies at stations which violate its policies (up to \$32,500. per utterance).

Moreover, we don't want (can't afford) to offend and alienate our listeners and underwriters.

To Reiterate:

The FCC states that *community standards of decency prevail*, and all it takes to trigger a legal disaster for you and for us is a single complaint. Thus, it's not really our or your judgement call, but that of any listener who might take offense over the slightest thing, no matter how innocent. We can't even argue that the offending language is a first amendment artistic statement. Why? We don't own the airwaves. The public owns them, and the FCC represents the public, not us. Because we are stewards of this borrowed public franchise, our first amendment protections are constrained by the audience we serve.

Beyond any determination of what may constitute vulgarity, obscenity, indecency or profanity, regardless of how subjective or socially defensible an utterance or its context might be argued, there is our brand image. Whenever you speak, you represent our brand. What others think of wfprofm depends on you. Flagrant violations are grounds for immediate dismissal, and the decision of management is final.

Besmirch our brand and community standing – consider yourself done without recourse.

It's our policy.



FCC Commissioner Jessica Rozenworcel sums it up in this photo.

Whenever you speak — think.
Is it kind? Is it true? Is it necessary?
Does it improve on the silence?
— Shirdi Sai Baba

Operational Stuff

FCC Station Inspections

All radio stations must be inspected by the FCC periodically to insure technical and operational compliance. There are also voluntary inspection services available that the FCC will consider in lieu of an actual site visit. The FCC also posts a self-inspection checklist for LPFM stations, Bulletin EB-18LPFM http://transition.fcc.gov/eb/bc-chklsts/EB18LPFM06_2008.pdf

The FCC may enter and inspect the station premises without notice during regular business hours. All wfprofm staff and members should engage an FCC inspector with full respect, courtesy and complete honesty. As an LPFM station we maintain a voluntary Public File which is available on site, and may be inspected during normal business hours. Allow the inspector to examine whatever he/she requests. Be prepared to assist the inspector should the need arise. The station's license and other documents are posted in the main studio. The station license includes oour licensed transmitting power, the geographic coordinates and street address of the transmitter site, the name and address of the licensee, and other key information.

In a broadcast station, all on-air personnel must have a *good working knowledge* of FCC rules. A good working knowledge means that you understand how to operate all aspects of the station. Remember: during a surprise FCC inspection, the inspector will expect <u>you</u> to know how to answer his/her questions and perform operational tasks as requested. Always call a manager when an FCC inspector visits, but you can't rely on the manager to tell you what to do.

If an inspector does visit for an unannounced inspection:

Request identification. All FCC inspectors carry an official FCC government ID.

Try to contact a manager or FCCA board member immediately.

Be gracious and courteous. Allow full access to the facilities and requested documents.

Be forthcoming. Answer all questions completely, honestly and truthfully.

Perform any tasks the inspector asks you to do to the best of your ability.

Make use of any and all instructions in notebooks or postings.

Note that **wfprofm**'s transmitter, Emergency Alert System (EAS), and program automation systems all automatically generate FCC compliant digital logs. However, it is essential that you understand and are able to explain to the FCC what these logs contain as legal and technical documents of record. You will be tested on this information with an oral or written exam and by demonstrating proficiency of operations. You cannot operate On-Air until this is satisfied.

Corrections to the Station and Program Logs should be made by drawing one line through the erroneous entry and initialing it. Erasures, edits or alterations of entries are not permitted.

Our Public Inspection File

FCC regulations require broadcast stations to maintain a file available for public inspection. See Sections 73.3526 (commercial broadcast) and 73.3527 (noncommercial educational broadcast service). However, these regulations don't apply to LPFM stations. See 47 C.F.R. §Â§ 73.801 and 74.480. Unlike other stations, LPFM community stations are not required to maintain a Public Inspection File. A Public File is a complex document which details a station's operation, its activities and its compliance with numerous FCC regulations. However, we are required to keep a Station Log which contains a Transmitter equipment maintenance log, an EAS Activity log, a copy of the station's current FCC license, and a Political File Notification.

The Station Manager is responsible for maintaining our voluntary Public File. This file must be kept in an easily accessible location and readily available for inspection upon request. The FCC usually reviews the Public File during an inspection.

Items include: A quarterly community issues/concerns list. This list is updated by the Manager on the l0th day of each quarter, (Jan, Apr, Jul, Oct.). It describes:

- Five to ten public service programs that the station ran during the preceding period.
- All current station ownership reports.
- All current EEO (Equal Employment Opportunity) reports.
- The FCC pamphlet, The Public and Broadcasting.
- Engineering reports and data as required by the FCC.
- Expired and current station licenses, construction permits as well as any renewals.
- Donor lists for sponsors of specific programs.
- Requests for air time from candidates for public office.

A physical copy of our Public File is available in the main studio. The Public File may be reviewed by anyone during normal business hours. That means members of the public can walk in off the street and demand to see it. We are also required to provide copies of requested items from our Public File. The Public File is also maintained in digital form, and can be provided on request as a set of PDF files on a compact disk. Whether copies are provided in digital or physical form, we may charge reasonable compensation for the cost of copies. (Physical copies at 10 cents per page, or a digital compact disk for two dollars)

Important! While you should accommodate anyone who requests our Public File, historically these are often people who take issue with the station. The FCC allows us to demand the name and address of anyone requesting our Public File. Be sure to obtain the requester's full name, phone number, postal and email addresses as well.

Logging Comments and Complaints:

If a member of the public calls or enters the station in order to lodge a complaint, it is essential that you accommodate him/her as courteously as is possible. Though you may be unable to discuss the issue in detail at the moment (if you are on the air or performing other tasks), ask for the complainant's name and phone number and a brief, accurate description of the complaint or comment. Assure the person that someone will get back to him/her. Submit your complete, accurate report of the comment or complaint to the Manager.

Automated Operation

Although this handbook describes best practices and guidelines for live operations at length, most of FPR's programming is prepared in advance – prerecorded – and then scheduled for playback via our automation systems. Today, most radio stations and networks operate this way. Unless the broadcast content is real-time information in the form of breaking news, weather, live sporting events, or requires audience interaction, most radio stations today prefer that programs be prepared and recorded in advance.

We use scheduled playback automation for a number of important reasons:

- We repeat programs at various times during a week or month to reach more listeners.
- You can be your own audience. Experience your program on-air as others do.
- Popular and notable programs may also encore months or years later.
- You can create programs at your convenience and on your schedule, not ours.
- Prerecording eliminates mistakes and station professionalism is greatly enhanced.
- We have a record of proof should anyone complain about the content of a program.
- Live operator scheduling, tardiness, absences and turnover are not an issue.

Sitting in a studio, waxing eloquent and playing your favorites on-air is a romantic radio notion. However, doing so without error in real time with great consistency at a polished, professional level for any length of time can prove stressful. What begins as fun with all good intent and interest quickly becomes a chore. You're also committed to a fixed schedule; often at odd hours. Broadcasting professionally, consistently, reliably is ongoing work.

Prerecording Programs – All you need to create a great radio program is a computer and sound recording/editing software, (We recommend Audacity. It's free.) a good quality microphone, a quiet place to work, and digital files of the music you wish to play.

We strongly encourage anyone interested in creating content to record/edit programs in advance for scheduled playback. This approach to programming provides an easy, very flexible starting point. It's a fault-free training ground for beginning programmers to develop their voice and audio production skills (No one ever gets to hear your mistakes). Your voice technique, style, personality, your confidence and mastery of craft all evolve more quickly through this approach because you can be your own audience. Recording your program in advance is how you can explore, discover and refine who you wish to be on the radio. Complete details for preparing and recording your own programs are available in a separate document.

Voice Tracking – Today, most professional DJs use program automation systems that enable voice tracking. This quasi-live-assist method blurs the distinction between live operation and pre-recorded programs. The DJ simply inserts his/her recorded comments into a pre-arranged music playlist. What the audience hears on-air sounds live and spontaneous. However, the DJ's voice might have been recorded only a minute or two earlier or several hours before an air shift. Voice tracking allows the DJ to take a quick break during any part of an otherwise live show or quickly record voice segments for an entire automated air shift of several hours.

The following day-to-day logs are also incorporated into our Public File:

On-Air Program Log:

The Program Log is an hour-by-hour record of program information. It includes such things as program and song titles, notes about the source and type of each program, hourly station IDs, underwriting announcements, station promos, PSAs, and EAS tests. Our playback automation system automatically maintains a digital program log of all events as broadcast: announcements, programs and music. Program Logs must accurately record what actually took place on the air, not what was scheduled to be broadcast. The Program Log must be kept in the studio at all times. On-air operators must sign in at the start of their studio operations and sign out when they have finished, marking their log entries clearly in ink. All Station and Program Logs must be kept on file for two years.

If you want to select and play songs from your own files or CDs during your program, whether it is live or prerecorded, you must maintain an accurate Program Log at all times.

Example of an Automatically Generated Program Log: FRANKLIN RADIO LOG FILE February 02, 2017

```
TIME
        TRACK / EVENT
10:29:00 [AUTOMATION STARTED]
10:29:01 PF - Sign-On Identification
10:29:35 DeWolfe Studio Session - Swinging at The Savoy
10:32:12 Carl Doy - I Finally Found Someone
10:35:41 SM - ID_Legal_B02
10:35:45 FR NylonGuitar bridge
10:35:47 Benny Carter - I'm in the Mood for Swing
10:35:47 [VOICE-TRACK] Thx~ I'm Peter J ID 08
10:42:33 George Winston - Theme to Grace, Lament
10:47:16
         More music 24 7 on Franklin Radio
10:47:19 Eva Cassidy - How Can I Keep From Singing
10:51:41 David Sanborn - Carly's Song
10:56:36 SM - ID_Legal_B04
10:56:39 FR PowerLeadGuitar bridge
10:56:41 SM_PF - Promo_Started30
10:57:10 and Moving right along
                                  More music
10:57:12 Leon Redbone - Pretty Baby
11:00:12 SM - ID Legal B02
11:00:16 FR JazzGuitarMinor bridge
11:00:19 [VOICE-TRACK] Thx~ I'm Peter J ID 04
          Relativity - In The Still Of the Night
11:00:19
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The Political File Notification is simply an annual statement maintained in the Public File that FPR has not provided air time to any political candidate during the current year.

Letters and emails from the public are not required to be kept, but it's good practice to do so.

Station (Transmitter Equipment and EAS) Logs and Program (On-Air Content) Logs: FCC oversight governs two key elements of operating a broadcast station: Proper technical design and operation of transmitters to keep stations from interfering with each other. Content that is transmitted over the air in public trust and interest. Each of these aspects requires an accurate log as a history of broadcast parameters, events and related information.

Station Transmitter Operations Log:

This log records all transmitter operations, power and modulation readings. FPR's transmitter automatically maintains a digital log of its operating parameters. The FCC classifies LPFM transmitters as being either attended or unattended. Attended stations are those which are staffed during all broadcasting hours by an operator responsible for operating the transmitter and EAS equipment. Unattended station transmitters are those which employ highly stable equipment and automatic monitoring systems that can alert station personnel or shut down out-of-tolerance transmitter operation within 3 hours. Our transmitter's digital, automated monitoring and logging system enables us to operate 24/7 as an unattended station.

The Station Log (a/k/a Transmitter or Operating Log) contains the following information:

- Transmitter readings, i.e. power output, normal operations, etc.
- Brief explanation of station outages due to malfunction, servicing, or replacement.
- Operations not in accordance with the station license.
- Sign on/off times or indication of continuous 24/7 operation.
- Any pertinent EAS information for that week.
- Legal signature of the operator on duty, in ink, with time and date of entry noted.

The Station Transmitter log is also used to record equipment malfunctions, discrepancies, and abnormal operations. Operators should include a description of the error or problem and the time and date it occurred. Should the studio or transmission equipment malfunction in a manner that disrupts or interferes with normal on-air programming, the On-air Operator should make all best efforts to restore normal transmitter control and operation. If the malfunction is serious, the member must immediately contact the Station Manager or Chief Operator and record the malfunction in the Station Log. The member should then proceed according to the Manager's instructions. If a Manager cannot be contacted, the member should call a staff member on the emergency contacts list. The emergency list is located on the studio message board and must not be removed. All transmitter malfunctions should be reported as soon as possible.

Out-of-tolerance conditions that necessitate adjustment or shutdown within 3 hours include:

Excessive TPO (Transmitter Power Output)

Excessive Program Modulation

The emission of spurious RF signals that do not result in harmful interference.

Out-of-tolerance conditions that necessitate a shutdown within 3 minutes include:

The emission of spurious RF signals that DO result in harmful interference.

Operation of the station outside its licensed operating hours.

The FCC requires that stations designate a Chief Operator. The Chief Operator maintains the Station Logs as well as its transmitter and EAS equipment. In the event of an out-of-tolerance condition, Members should notify the station's Chief Operator.

Transmitter Operation – Technical Essentials

Voltage and Current readings are sampled at the point where electrical power is applied to the transmitter's final RF amplifier stage that feeds the antenna system. $\mathbf{E}_{in} \times \mathbf{I}_{in} \times \mathbf{E} = \mathbf{W}_{out}$ • Input Voltage (E) * Current (I) * Amplifier Stage Efficiency (E) = RF Output Power (W)

Our transmission system's total *Power/Efficiency Factor* (**F**) is a sum of factors:

- How efficiently input power is converted to RF output by the transmitter's final stage. In our case, 9.7 Volts at 3.7 Amps (36 Watts in) at 45% efficiency = 16 Watts RF out.
- There is RF power *Line Loss* through the length of transmission cable to our antenna system. Our 140' cable loses 1dB, (~11%) of power, delivering about 14 Watts to our antennas.
- The *Radiating Efficiency* of our antenna system as compared to the FCC's standard antenna. Each antenna is only 45% efficient, but our stack of 3 antennas adds up to 135%. Thus, 14 Watts at 135% become 19 Watts of *Effective Radiated Power* (ERP).

Our three circularly polarized antennas are less efficient than the FCC's standard antenna, but they can fill in reception nulls with better overall signal penetration into obscured areas. Thus, our transmitter's RF Efficiency, cable Line Losses and Antenna Efficiency are all combined in the Total Efficiency Factor (F) in our licensed *Effective Radiated Power* (ERP) calculations.

wfprofm's transmitter is not located at our studio. We use a remote control system to monitor and operate the transmitter. FCC rules specify that an FM station's power (ERP) shall not exceed 105% or be less than 90% of the figure specified on the license. Our transmitter's output power is automatically self-regulated, but must be logged daily. Minor power fluctuations may occur over time due to voltage variations from the electric company. These variations can cause the transmitter output to become high or low. Although a rare event, the transmitter operator (you) are authorized to adjust the transmitter output to 16 Watts to bring the station into compliance.

Modulation refers to the volume of program audio into the transmitter. If the transmitter's audio VU meters (Volume Units) indicate in the red region above 100%, the audio is overmodulating the transmitter. The FCC requires that the station's peak program audio level not exceed 100% more than six times a minute. That averages once every 10 seconds. Our transmitter manages modulation automatically. To correct overmodulation, reduce the audio level in the transmitter.

We are authorized to operate our remote transmitter unattended, provided that we can correct technical problems within an hour. Our transmitter has an online remote kill switch. In such emergencies it may be activated to disable the transmitter from anywhere via the internet.

EAS – Emergency Alert System and EAS Log:

All Radio and TV stations are required by the FCC to participate in the Emergency Alert System. EAS enables federal, state and local officials to quickly communicate with the public in the event of an emergency. Weather emergencies include floods, tornadoes, earthquakes, etc. Man-made emergencies might be war, a bomb threat, an AMBER child abduction alert, or a local hazardous chemical release.

You've heard the phrase,

"This is a test. This is a test of the Emergency Alert System. This is only a test."

This language is familiar to all of us. EAS, The Emergency Alert System is a broadcast service. The FCC is adamant about EAS compliance. It's often the first thing an inspector will check. The FCC insists that every station fully understands how and when to use this system.

The FCC requires that radio stations perform an EAS test once each week. Our system does this automatically at a random time in normal business hours. To perform a test manually, activate the EAS encoder. Our system plays a recorded test message, completes the test cycle and then returns to normal programming. Our EAS test must be noted on the Station Logs.

All radio stations are required to install equipment to receive EAS tests from other designated station(s) in the system. Our EAS equipment monitors other *Local Primary* radio stations 24/7. Local Primary stations in turn monitor State and National Primary stations. When we receive a test (we should receive one from another station at least once a week) the operator must note the time received on the Station Log. During an actual emergency an EAS alert signal and specific safety instructions will be transmitted via the station(s) we monitor.

The FCC requires that radio stations perform an EAS test once each week. To perform a test, activate the EAS encoder. Our system plays a recorded test message, completes the test cycle and then returns to normal programming. Our EAS test must be noted on the Station Logs.

It is your responsibility to know and understand all aspects of our EAS system and its operation. Any of our monitoring receivers may be triggered by a transmitted alert at any time. If you're not sure how this system works, ask to review its operation with a manager.

EAS Activation Sources:

FPR receives its EAS alerts by monitoring other assigned radio stations and sources of audio. Specifically, our EAS radios are set to monitor:

WBZ FM, Boston as our primary alert station

WSRS FM in Worcester as our secondary alert station.

We also monitor KBOX/NWS, the NOAA National Weather Service (WX),

FPR is also an IPAWS Participating National (PN) Station.

In addition to standard EAS alerts, the FCC has introduced a new system called IPAWS (Integrated Public Alert and Warning System). It is a nationwide system that uses multiple means to disseminate alerts, including SMS, Billboards, the Internet, NOAA/NWS, and traditional broadcasts. A key feature of IPAWS enables stations to receive alerts via the internet. Currently FEMA is conducting weekly tests of IPAWS, and as such, FPR should receive and log a "CAP" alert from FEMA every Monday at 11:05AM local time.

EAS may be activated by national, state or local officials as required.

EAS Alerts – National:

A national alert (EAN) may be activated only by the White House. EAS enables The President, FEMA and other Federal officials to communicate with the American Public within 15 minutes of its activation. Be advised that the entire EAN process is automatic, and it will take over control of **wfprofm** entirely. That's the point: EAS allows the President to address the entire nation on every radio, TV and cable TV station. The White House will effectively take control of **wfprofm** until they send an End of Message (EOM) command, which will then return control back to all local station(s). Note that a Presidential National Alert has never been triggered, and this alert has only been tested once.

National level activation employs a code-word security system to guard against false alerts. Stations must keep their EAS information and logs at their main control point. If you do receive a national alert, the first thing to do is *not panic*. Contact a Manager as soon as possible, and follow the instructions for National EAS Alerts posted in the studio.

EAS Alerts – State and Local:

Local/State alerts can be sent by State Police, MEMA – our State Emergency Management Team, NOAA weather officials, the Governor's office, and other safety organizations.

Generally speaking, weather *watches* are not broadcast, but weather *warnings* are, since they warn of imminent severe weather conditions. A *watch* just means that severe weather in your area is a possibility, and conditions are being monitored by officials.

Sometimes the alert is a statewide Civil Emergency of some kind, but these are rare. Another somewhat common use is the AMBER Alert, or as the official EAS code (CAE) describes it: a Child Abduction Emergency. This alert is sent whenever authorities believe that a child has been kidnapped; the perpetrator is fleeing the area, and they have a description of the vehicle. CAE can get the word out to many thousands of people who can alert police if they spot the abducted child in question.

Our EAS system and equipment are completely automated. The EAS test message will bypass our programming and briefly take control of the station. It will broadcast a test or alert message and then return to our normal programming. Again, if you need guidance, consult the Station Log for EAS directions.

Weekly EAS Tests

The FCC requires that stations perform an EAS test once a week. The system at **wfprofm** uses a prerecorded test message and is fully automatic. It will conduct the test at least once each week at a random time within normal business hours. **wfprofm** must confirm that we received a test and, separately, that we transmitted a test. During any week that an actual EAS alert was received and/or sent, a required weekly test is not necessary. After a test is performed, you must note it on the Station Log. (The automatic EAS Log is incorporated into these logs.)

You must know where our EAS system is located and how to trigger a test manually.

Reception of a weekly test is automatic, and we'll receive perhaps up to four of these tests each week from the various sources that we monitor. We only need one, but redundancy is good.

Our own weekly EAS test transmission is triggered automatically by our equipment. Do not manually trigger a test without authorization of a manager unless you are specifically directed to do so by an FCC inspector. Instructions can be found in the Station Log.

Required Monthly Tests are more stringent; wfprofm must receive the RMT and retransmit it within a preset amount of time. Again, this is completely automatic. If you need to trigger a monthly test retransmission manually, consult the Station Log.

EAS Printouts / Logging:

The FCC requires that all EAS events, whether broadcast or not, must be logged. Our EAS equipment has an automatic digital logging system. Do not tamper with these files or printouts; the designated Chief Operator will review these files weekly. If our equipment failed to either receive or send an EAS activation, the Chief Operator must determine why we did not receive or send an alert, take corrective action, and note both the problem and solution in the EAS log.

```
Example of an Automatically Generated Weekly EAS Log:
______
Server: 'DASDEC WFPR' @ 192.168.1.5
DASDEC-1EN Alert Report at 'Sun May 7 00:00:00 2017 EDT
From 'Sun Apr 30 00:00:00 2017 EDT' to 'Sun May 7 00:00:00 2017 EDT
______
           REQUIRED WEEKLY TEST 'WSRS-FM(L1)'(WSRS ) ORG=EAS
459: RWT
           'Sun Apr 30 02:20:00 2017 EDT' to 'Sun Apr 30 03:20:00 2017 EDT'
     Decoded: 'Sun Apr 30 02:20:12 2017 EDT'
            Worcester, MA(025027)
                                        'WBZ-FM(R1)'(WBZ FM ) ORG=EAS
460:
           REQUIRED WEEKLY TEST
     RWT
           'Sun Apr 30 02:30:00 2017 EDT' to 'Sun Apr 30 06:30:00 2017 EDT'
     Decoded: 'Sun Apr 30 02:30:32 2017 EDT'
            Massachusetts(025000)
466:
     RWT
           REQUIRED WEEKLY TEST
                                       'CAP1'(IPAWSCAP) ORG=CIV
           'Mon May 1 11:01:00 2017 EDT' to 'Mon May 1 12:01:00 2017 EDT'
     Decoded: 'Mon May 1 11:01:59 2017 EDT'
            Connecticut(009000)
            New Hampshire (033000)
            New Jersey(034000)
            New York(036000)
            Rhode Island(044000)
            Vermont(050000)
                                      'WBZ-FM(R1)'(WBZ FM ) ORG=EAS
465: RWT
           REQUIRED WEEKLY TEST
           'Tue May 2 00:37:00 2017 EDT' to 'Tue May 2 04:37:00 2017 EDT'
     Decoded: 'Tue May 2 00:37:34 2017 EDT'
            Massachusetts(025000)
           REQUIRED WEEKLY TEST
                                       'L2'(KBOX/NWS) ORG=WXR
461:
     RWT
           'Wed May 3 11:00:00 2017 EDT' to 'Wed May 3 11:15:00 2017 EDT'
     Decoded: 'Wed May 3 11:00:59 2017 EDT'
            Tolland, CT(009013)
Cheshire, NH(033005)
Hillsborough NUL(0222
            Hillsborough, NH(033011) Franklin, MA(025011)
            Providence, RI(044007)

MA(025015)
                                  Hampden, MA(025013)
                                  Worcester, MA(025027)
            Middlesex, MA(025017)
           REQUIRED WEEKLY TEST
                                        'Orig'(WFPR ) ORG=EAS
452: RWT
           'Fri May 5 12:11:00 2017 EDT' to 'Fri May 5 12:26:00 2017 EDT'
     Originated: 'Fri May 5 12:11:34 2017 EDT'
            Norfolk, MA(025021)
6 total events found for this time period
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Housekeeping Stuff

Communication, Internal

FPR maintains an On-Air List Serve – a group email reflector for internal communication across FPR staff, members and programmers. This is the primary way we communicate as a group. As such, it is essential that all staff and members read emails from the On-Air List Serve. For those without email or internet access, a computer is available at the studio and tech staff can arrange email accounts as needed.

The On-Air List is typically low volume. We use topic tags to flag important messages, noting which emails contain essential information and which are optional. These tags appear in the subject line of the emails in brackets.

The following essential tags are used by the Manager for relaying key info to programmers.

- [tech] For tech/ops info and answers to be passed along to programmers.
- [admin] Non-policy administrative information.
- [policy] For clarifications or new policy info to programmers.

The following tags are used by anyone, and are optional:

- [fill-in] Programmers looking for fill-ins.
- [promo] When a programmer has a special guest, event or other information that they want other programmers to announce on their shows. Also press releases go out on this tag.
- [help] When a programmer needs help or info for something related to the station or their show. For example, this would be the tag for technical questions.

Messages, Mail, and the Studio Message Board:

It is every member's responsibility to check for posted messages and mail on a weekly basis. Note that all mail delivered to FPR, regardless of the addressee, is the property of FPR. Written messages should be clearly posted on the Message Board in the studio. Members should also check the Studio Message Board regularly.

Personal Information & Privacy:

Each volunteer must keep their current address, telephone numbers and (if available) fax and email information on file with the station. No contact information will be released to outsiders without the written permission of the member. Contact information is for internal use only.

Communication, External

Answering Listener Questions:

Listeners may call the station asking for information about something that they heard on the air. If the on-air member who made the announcement is not available, FPR's policy is to take a detailed message and post it on the Message Board. It is against our policy to give out member phone numbers or call members at home or work about announcements made during their programs. Calling members at home or work should be limited to helping them with their FPR activities or informing them promptly about phone inquiries of the utmost urgency. If the person who takes the call is too busy, or the information is not readily available, politely thank the listener for calling and apologize for not being able to assist further.

Public Relations:

Under no circumstances should members respond to questions or comments by the media. All media requests should be forwarded to the Station Manager or FCCA Executive Director.

Members may not use **wfprofm** letterhead to correspond about a personal matter, conclusion or point of view. FPR holds personally liable any member whose unapproved public comments or behavior results in expenses, legal fees, fines, and if necessary, FPR may pursue legal remedies.

Special Events:

Members are encouraged to assist with at least one special event per year. Special events can include fundraisers, promotional events, local meetings, or other public gatherings and events.

Public Events and Political Activities:

By policy, FPR's stance is non-partisan. At public events or political activities, members must make clear to others that they represent only themselves and not FPR. This includes performing as a DJ or presenting on stage. FPR does not tolerate questionable personal decorum at any time.

Criticisms:

Every member has the right to address perceived problems within the station. However, on-air criticism of station policy, operations or other members is highly inappropriate and strongly discouraged. On-air members are asked to consider FPR's public image and mission, and the effect on listeners and underwriters from airing negative and disparaging comments about FPR, its facilities, or its policies and practices.

Social Media Sites:

FCCA/FPR policy regarding social media sites, websites, accounts and internet related activities is of particular importance. Items or comments posted to the internet can go viral, making them difficult to edit or remove. What follows is explicit FCCA policy and guidelines on social sites and your use of them as part of our external communications.

FCCA Social Media Guidelines (Facebook, Twitter & like accounts)

FCCA maintain websites, Facebook, Twitter, Instagram and like accounts as a means to reach our audience and disseminate unbiased, factual and useful information. Our social media sites inform the public of our activities and our programming schedule. We also post information about local events and activities of community interest, or information about local charitable organizations that provide pro bono services to the community.

FCCA reserve the right, yet have no obligation to respond to third party posted comments. We do not engage in dialogue or private messaging via social media. We are not obligated to follow, friend or link to any organization or individual. We may follow or link to government sites or charitable agency sites in order to circulate information of interest to the community.

FCCA reserve the right to monitor and manage all content posted to our social media sites and to modify or remove posts or comments that we deem, in our sole discretion, to be inappropriate for the service, including, but not limited to, the following:

- Personal attacks, defamatory, abusive, malicious insults or threatening language.
- Intimidating, harassing, racist, sexist, offensive, discriminatory, or hate speech.
- Calls to suggest or incite violence of any kind.
- Statements that could compromise public safety and security.
- Vulgar, obscene, sexual or profane language, statements or innuendo.
- Infringements upon intellectual property rights, including but not limited to, brand or trade names, logos, copyrights or trade secrets of any person, business or place.
- Potentially libelous, slanderous, defamatory comments; ad hominem, personal attacks.
- Support or opposition for political campaigns.
- Commercial or self-promotional language or links to spam.
- Content deemed to be off-topic or to disrupt the purposes of the social media site, its followers, and its sense of community and acceptance.
- Content posted via fake accounts or anonymous users.
- FCCA confidential or non-public information or correspondence, e.g., financial, operational, legal or general information, or personal information.

Only named authorized individuals may post information directly to our social media sites: Employees and members (you) may be authorized per occasion to post for specific purposes. You must obtain permission from an FCCA manager before commenting via blogs or social media, or posting any letter or article, or making any form of public address in which you in any way officially represent, or may be assumed to represent FCCA, FranklinoTV or wfprofm. Such an article or address must be approved by a manager prior to publication.

Some subjects can invite a flame war where emotions run high (e.g. politics and religion). Show respect for the opinions of others. Our social media sites are not an appropriate place to react to complaints or rants about us or our programming or activities. Do not respond to controversial, offensive or negative posts. Refer these to a manager. We do want to know about such issues, but audience complaints or negative comments are best handled by other means.

FCCA acknowledge that you may maintain personal websites and social media accounts to communicate and share postings with family, friends, and the public. You may note yourself as a volunteer at Franklin TV or wfpr fm when posting on your own sites. However, indicate that your posts are your personal views. If you post a comment about an FCCA related matter, include a disclaimer that the posted comment is your opinion. (e.g., IMHO).

Our call sign, wfpr is a brand, assigned by the FCC. Franklin•TV and wfpr•fm are brands as internet domain names, assigned by ICANN. We have a legal obligation to maintain our brands. You may not establish websites or internet identities or social media site accounts or user names that incorporate wfpr or Franklin TV in any form as part of any site URL or account name.

Programs that you author via **Franklin**•TV or **wfpr**•fm are your own copyrighted Works. You may freely incorporate, use, publish, promote and distribute your programs and their names independently and apart from **Franklin**•TV or **wfpr**•fm as you wish.

Privacy does not exist in social media. Content that you submit to any social media site is public; may be further reposted and/or circulated by others unknown, and may be subject to Massachusetts public records law. Your posting to our sites does not obligate FCCA to you in any way. We are free to use ideas disclosed in your content on a non-confidential basis and to disclose your content to others without any liability to you. Do not post or submit unsolicited ideas to our social sites. Generally, we don't accept these, and by posting, you relinquish any ownership claims or rights in such ideas. We will not compensate you, and we don't waive any rights to use similar or related ideas previously known to us or obtained from other sources.

Many assume that content on the internet is free to be reused by others. This is not true. The creator (audio, video, image or text) retains rights to the Work. While some social sites allow content to be shared within them, extracting, modifying and repurposing content can lead to issues. Additionally, providing attribution is not enough, nor is sharing a link to the original site. While linking to content is permissible in most cases, even that must be done carefully.

By submitting content as Works to FCCA or by posting to our social sites, you represent and warrant to FCCA that you are the owner of the Works; that you have legal authority to freely grant rights to use and promote the Works, and that our use will not violate the rights of any third party, including, but not limited to copyright rights.

The Essentials – Our House Rules

Personal Conduct:

FPR is committed to providing everyone equally with a welcoming, socially safe, professional environment free of harassment and discrimination. We fully respect the rights of all people, regardless of race, color, ancestry, place of origin, sex, sexual orientation, marital status, gender identity, family status, religion, disability, political belief, and social or economic status. We do not tolerate any form of discrimination or harassment.

Tardiness and Attendance:

On-air members are expected to start and end their programs on time. If you will be late, call and notify the Station Manager or the member operating the preceding shift. A member who receives such a call is requested to remain until the late member has arrived and should record the event in the On-Air Program Log. If the operating member must leave prior to the late member's arrival, he/she may sign-out and switch to program automation.

Members who are unable to fulfill their scheduled shifts must notify the station and find a substitute that meets the Station Manager's approval. Advance notice is essential. Recurring absences with short notification, or missing four consecutive weeks will result in a position being permanently assigned to another member. Failure to notify the station of an upcoming absence and, thus, leaving an assigned position vacant may result in removal from the schedule.

Telephone Calls and Courtesy:

Members are expected to behave courteously and professionally toward everyone they encounter at the station, including phone callers. Members who are on the air during times when no other members are on duty are expected to answer the phone. Answer the phone promptly and courteously by saying, "WFPR, Franklin Public Radio." Take messages as needed; these calls may be important business to the station. No long distance calls are permitted. Phone calls should not be excessive in length.

Alcohol and Drugs:

FPR strictly forbids the possession and/or use of any illegal or controlled substance on the studio premises. FPR strictly forbids possession and/or use of alcoholic beverages by on-air members and program producers within four hours prior to, or at any time during, production or live broadcast of their programs. FPR strictly forbids possession and/or use of alcoholic beverages in control rooms, studios and in any room from which FPR's broadcast originates. Persons who violate any part of this policy will be subject to dismissal. FPR forbids the presence of empty alcohol containers in any rooms.

Smoking:

Smoking is not permitted on the premises. Smoking is allowed outside the building, but with due regard for the presence of others. Please dispose of cigarette butts properly and safely.

Food and Beverages:

An innocent, accidental spill can inflict as much serious damage to equipment as a deliberate attack. If you must have something to eat or drink, *please exercise the greatest caution*. Keep food and drink far away from the control board and other audio equipment. A spill proof drinking container is preferred.

Housekeeping:

Members must keep work areas neat and orderly. Members are expected to clean up after themselves (including bathrooms), to keep equipment and materials organized in their proper places, and to place litter in proper bins. Recycling bins are clearly marked. Volunteers are advised not to store personal items at the station for extended periods.

The rule of thumb here is: Leave the place tidier than you found it. There is no cleaning staff to come in after us. We are it. Please do not leave empty food or beverage containers, scraps of paper and other personal items lying around. If you use music CDs from our library, return them before you leave. If you use a computer to access websites, close the sites before you leave.

Parking:

Please do not park in space reserved for the handicapped unless you are so entitled. Please do not block access to the rear studio or doors where equipment is often loaded in and out.

Safety and Security:

Members who admit anyone into the station are responsible for the conduct of whomever they admit. All are responsible for taking reasonable steps to ensure the safety and security of the station facilities and equipment. You have the right and responsibility to question any stranger on the premises. You have the right to ask anyone to leave immediately if they are disruptive, threatening, or behaving suspiciously or simply have no valid reason for being in the building. If any situation threatens the building or interferes with FPR's control of broadcast programming, immediately request assistance from the Station Manager, or other designated people on the contact list (posted on the Message Board), or in extreme cases, the police.

Exterior doors must be locked at all times when the building is unattended. Anyone finding exterior doors unlocked during non-business hours must inform the management immediately. All must uphold FPR's access key policy.

Keys and Facility Access Policy:

The Station Manager is responsible for the distribution and collection of all station keys, and must keep an accurate list of keys issued and those who have access to security system codes. The Station Manager determines who receives access keys and may issue keys to those who meet one or more of the following criteria:

Women who host or produce shows after dark;

Personnel designated to open and close the studio;

Personnel who have special duties and/or need 24/7 access.

Property, Yours and Ours

All are expected to exercise care in the use of station property (building, supplies, libraries, and equipment) and to use such property only for authorized purposes. Negligence in the care and use of such property may be considered cause for dismissal. The Station Manager must approve personal use of station property in advance. Unauthorized removal of FPR property from the premises, or its unauthorized personal use, will be considered sufficient cause for dismissal, and appropriate authorities may be notified.

When using station property, members must adhere to the following:

No FPR equipment or supplies may leave the premises without permission from the Program Director. Any remote/portable recording equipment or supplies approved to leave the studio must be signed out in the equipment logbook.

All members are expected to treat equipment and supplies with care and respect. Evidence of damage or misuse of equipment or supplies may result in dismissal. Malfunctioning or damaged equipment should be reported immediately to the Program Director.

Personal Property:

All members are solely responsible for personal property and materials stored on the premises. FPR will not be responsible for any damage to or loss of personal materials on FPR premises, regardless of cause. Personal items should be clearly marked with the owner's name.

Music Library:

Our music library consists of digital WAV files organized by genre and prepared for broadcast. The original record albums, tapes and compact discs are in storage and are not available for use. You may not make digital copies of our music files for your personal use. When preparing new digital music files for our library, handle CDs and other physical recordings with care, and do not remove them from the library or studio.

You may generate and maintain a separate personal library of digital music files on our servers for use in your own programming. The essential rule about music in any form is to respect it as property, as it belongs to the station or to someone else.

Recordings are Property:

All programs produced using station equipment or supplies remain the property of FPR and the authoring producer unless other arrangement is made in writing for an exemption, or a contract is negotiated in which FCCA/FPR assigns specific rights.

It is illegal to sell a recording of any portion of a broadcast program that includes passages or material copyrighted by another party (i.e. a portion of a program that includes music.), except under "fair use" as defined under Broadcast and Copyright Law. FPR holds personally liable any member or his/her guest who violates this provision. Liability includes, but is not limited to, any related expenses, charges, or fines. Failure to comply with this provision is grounds for dismissal. FPR may pursue legal remedies.

Music Acquisition:

FPR generally does not purchase recorded music. The music library includes recordings from record labels and donated items. The Program Director determines how to allocate donated music including, but not limited to, being added to the library, used as premiums, sold at record sales, or given to individuals. Upon receipt, the Program Director will mark physical recordings as FPR property to distinguish between station property and personal property.

Members may be authorized by the Program Director to correspond with, or otherwise contact music companies, agents or artists in order to acquire music for the station that is appropriate for their programming. Any member who originates such contact should keep the Program Director informed. In making these contacts, a member who misrepresents his/her role at the station may be subject to dismissal. If any benefits, such as concert tickets or free CDs related to these activities are made available, the member and the Program Director will determine the disposition of these complimentary items. Members who accept funds or goods on behalf of FPR must turn these over to a manager on the first working day following acceptance.

Recording companies sometimes offer individuals who host programs opportunities to purchase additional copies of particular recordings for their own collections. As a general rule, members are encouraged to request that purchased recordings be sent to their homes. If, however, the record companies will only send orders to the station, the member should post a notice on the message board of any purchases expected to arrive at the station. The Program Director will then review all packages arriving that contain recorded music and set aside items that belong to members who have posted notices.

Handling Emergencies

Accidents:

We encourage everyone to be safety conscious. In the event of an accident or injury, respond immediately, (i.e. call 911 for an ambulance, if needed) and then report the accident to a manager as soon as possible. First-aid kits are located in video studios, the equipment maintenance area, and the kitchen and restrooms.

Fire:

In case of fire, the following procedures must be followed:

- Evacuate everyone in a calm and orderly manner.
- Call 911 emergency services.
- Close doors to prevent fire from spreading.
- Use an extinguisher if possible.

Extinguishers are maintained in the following areas:

- The front foyer utility closet
- The technical maintenance area
- Video studios, by their control room doors
- The kitchen, near the cooking range
- The emergency generator storage room

Bomb Threats:

All bomb threats should be taken seriously and acted upon. If the station receives a bomb threat, the following procedures must be followed:

- Record any and all pertinent information.
- Call 911 for the police.
- Live on-air personnel should start program automation and leave.
- Immediately evacuate everyone from the building.
- Do not re-enter the building until the police have declared it safe.

Stuff We Hate

- Demeaning, rude, discriminatory and/or inconsiderate behavior of any kind.
- Obscenity/indecency/profanity or hate speech of any kind, on-air or off.
- Commercial or promotional speech of any kind on-air.
- Intoxicated/under the influence while on-air.
- Problems with making proper legal ID's.
- Failure to meet underwriting message and PSA requirements.
- Failure to timely and properly maintain FCC Station and Program Logs.
- Failure to adhere strictly to all FCC regulations.
- Interfering with another scheduled program (live or automated).
- Arriving late or not showing up.
- Spilled food and/or drink. Not cleaning up after yourself.
- Failure to lock doors, windows, and set alarm when locking up.
- Lights and equipment left on.
- Unauthorized removal or borrowing of equipment or music files.

We quickly fix or eliminate stuff we hate – with certainty and finality. We have to.

Stuff We Like

- Professionalism in decorum and attitude (while still having fun).
- Thoroughness and attention to detail the FCC cares. We do too.
- Making yourself better at what you wish to do and we're here to help.
- Doing the tedious, invisible, often thankless tasks that make it all work.
- Finding more volunteers to help out. (There are never enough).
- Finding more underwriters to help keep the lights (and transmitter) on.
- Your abiding interest and efforts in making our mission work.
- You for taking the time to read, understand and follow this handbook.

We fully support, encourage and try to help out with stuff we like. We want to.

A Final Word

Whether you are a full or part-time staffer or a volunteer member, you are a key part of FPR's voice and vision. Working together, we create, promote and maintain a strong and vibrant local community and valued public service agenda in support of Franklin's service organizations.

We end this handbook as we began – with our singular mission for Franklin Public Radio:

Do all you can to, "Amplify the Public Good".

Welcome, and thanks for being a part of our exciting, ongoing broadcast adventure!

Pete Fasciano, Executive Director, Franklin TV and wfprofm

Additional Stuff

Self-Evaluation – Checklist

The following evaluation is designed as a guide for host/producers of music, talk and mixed music/talk shows. You may find some questions more pertinent than others. Please do your best to consider how each item might apply to you and your program.

Voice and Mic Technique:

- When speaking, do you enunciate clearly and is it easy to understand what you say?
- Can you hear your breathing or distracting noises from your mouth?
- Can you hear background or room noise (i.e. paper shuffling, pen tapping)?
- Can you hear the sound of the microphone being moved or adjusted?

Program Audio Levels:

- Do audio levels vary noticeably between elements of your program (music tracks, voice, etc)?
- If more than one person is present, is the level of each voice similar?
- Are your audio levels too high? Is there any fuzz or distortion of the sound?
- Do you keep your voice level fairly constant from beginning to end of sentences?
- Can everything you say be heard clearly, consistently when speaking over music? Overall Rating 1 2 3

Transitions:

- Are the transitions and flow of the music from song to song smooth?
- Are they sensible? On time? On beat? Continuous? Consistent?
- Is there any dead air?

Overall Rating 1 2 3

Introduction and Information:

- Do you clearly identify yourself, your program and your guests and topics at the beginning and at intervals during your show?
- As the host, are you clear about what the content of the show is or will be?
- Do you provide information about what you play or talk about, the issues you are discussing, the topics to be covered?
- Do you let you listeners know about what you intend to play/talk about/discuss later?

Presentation of Information:

- Is the balance between music and talk appropriate?
- Is your talk/information interesting and relevant to your program?
- Do you overuse filler utterances, "um...", "so...", "ah...", etc?
- Do you overuse or repeat a particular phrase or expression?
- Do you sound well prepared, like you've thought about what you want to say before saying it?
- Is your off-topic chatter/banter informative and/or genuinely entertaining to listeners?

Research:

- Do you research your material including guests, topic, music, as well as of upcoming events, shows, actions, meetings, etc.?
- When planning the content of your show, do you consider issues like bias, balance, gender representation, and diversity?

Context:

- Do you provide appropriate and necessary background information about the topics and music being discussed on your show?
- Do you provide relevant and intelligent information about the material you are playing/issues and topics you are discussing?

Accessibility:

- Do you make your program reasonably accessible to listeners previously unfamiliar with the material contained in the program? How?
- Are your on-air discussions guided for the benefit of your audience, or does the discussion become exclusionary (i.e. "in" jokes between you and guests, comments obviously directed to a single listener or group of listeners)?
- Do you use too much jargon (overly technical words, radio words like "PSA")?

Contextualization:

- Do you provide any contextualization for potentially offensive material? If so, are the warnings appropriate and adequate?
- Do you provide disclaimers before/after airing an opinion (yours or a guest's)?
- Do you provide contact information for yourself and or guests at predictable and regular times throughout your show?
- When you have made a mistake on air, how would you evaluate your on air recovery? Do you make a correction?

Program Log:

- Are IDs done correctly (WFPR LP, Franklin) and on time (on or near top of the hour)?
- Do you read or play at least two PSAs?
- Do you announce information about the next show or other shows? (optional)
- Did you record the host name, show name, PSAs, sign in/out on the Program Log?
- Do you start and end your show on time?
- Do you do complete studio shutdowns as described in this handbook?

Check List for Clearing Members as Programmers for Live Board Operation

Programmer:	Date:
Clearing Trainer:	Date Cleared:

- Properly signed into Program Log
- Knows Name & Use of the audio mixer's Program & Audition busses
- Demonstrated switching monitors between Program and Audition & explained use
- Knows name and use of each mixer input/output, main faders and volume trimmers
- Demonstrated using, mixing and switching mics correctly
- Demonstrated switching/mixing sources: CD players, turntable and tapes correctly
- Operate the mixing console for remote feeds, news, sports and other events?
- Know what legal IDs consist of and when to do them?
- Perform a coherent air break: back-announcing, call sign, frequency, DJ name
- Knows not to say any of the forbidden words or play recordings of them
- Has the operator been: FCC certified for EAS and station inspection?
- Knows how to read/interpret audio and transmitter meters
- Demonstrated receiving and controlling a phone call for live broadcast
 - Notified the caller they were live on air
- Demonstrated locating PSA/Promo/Announcements script library
- Demonstrated logging PSA on Program Log
- Demonstrated turning the program automation system on and off
- Know what to do in case the person scheduled after him/her doesn't show up?
- Demonstrated locating and opening his/her personal program folder
- Demonstrated renaming a recorded program file and dropping into PROGRAM folder
- Demonstrated burning a CD from a program file
- Has a recorded promo in rotation
- Know to answer the phone "WFPR!" and be courteous to callers?
- Demonstrated proper studio shutdown:
 - All production mixer inputs are OFF
 - Program (PGM) feed into TX mixer is OFF
 - Monitor source set to TX mixer PGM
 - Speaker volume is on at a low setting
 - Automation is ON and playing
 - Signed out on Program Log
 - Logs are properly completed and filed
 - All other inputs to the transmitter input mixer are OFF
 - CD, tape deck, turntables OFF
 - Tables/counters CLEAN, Studio lights OFF

FCC and Station Policy Quiz

This is an open-book take-home quiz. The primary goal is to ensure your knowledge of the laws and policies that guide and restrict your use of the public airwaves. You must pass it to be granted on-air access as a programmer. You may take it as many times as necessary.

Name:	Date:
Reviewed by:	Date:
What does the LP in LP FM stand for?	
What is our frequency?	What are our call letters?
What is our website?	
How many volunteer hours are you require	ed per month?
Place a check mark next to each legal stati A. 102.9 FM in Franklin, WFPR B. WFPR-LP FM, Franklin C. WFPR, 102.9 FM D. WFPR, 102.9 FM, Franklin E. WFPR in Franklin F. All of the Above	ion ID.
When must a legal station ID be aired?	
How many PSAs are required per hour? _	
_	le:
	le:
What is <i>payola</i> ? Give one example:	
What is <i>plugola</i> ? Give one example:	

The FCC uses a 3 prong test to define obscenity. List the three factors:
1
2
3
When can obscene material be aired?
What is indecency?
When can indecent material be aired?
What is profanity?
When can profane material be aired?
What is Safe Harbor?
When is Safe Harbor?

PART II: What's your Indecency IQ? Be the FCC-for-a-Day and test your knowledge about indecency rules. One wrong and you're guilty of an indecent utterance for which you could be fined up to \$32,500. More than three wrong, and you risk possible revocation of your license.

- 1. The FCC is concerned only about "bits," routines, and call-ins or call-outs that dwell on sexual content, like the couple that "coupled" in St. Patrick's Cathedral.
- 2. The FCC will slam me for cussing in Czech.
- 3. It is okay to use "code words" for body parts and sexual acts.
- 4. Profanity counts even if it goes out over the air by mistake, like if a mike is left on.
- 5. There is an exception for profanity of practical jokes station personalities play on each other.
- 6. Even though listening drops off significantly after afternoon drive, the FCC still cares about indecency in the evening hours.
- 7. What plays in Philly may not in Fresno. Station location determines if a broadcast is indecent.
- 8. Song titles mentioned on the air, like "Fuck It," are not exempt from indecency prosecution.
- 9. There is a limited exemption for song lyrics, like "Fuck what I said it don't mean shit now," so long as they are sung or spoken by the artist performing the song.

- 10. The FCC has a news exemption for serious reporting of bona fide news events, so profanity heard in the background of a report on a rock concert would not be subject to prosecution.
- 11. Even if a joke or bit has a genuine association, like celebrating Thomas Crapper's birthday with some toilet humor, the FCC could come down on it.
- 12. There is no need to worry about lyrics in "classic" songs like "Louie Louie."
- 13. The FCC distinguishes between a live broadcast of, for example, a rock concert, and the broadcast of a concert previously recorded. There may be no excuse for profanity heard in the recorded version since it can be edited for broadcast, but the live broadcast is forgivable.
- 14. A little indecency is an acceptable risk from a cost-benefit standpoint, if a show is profitable.
- 15. Under the First Amendment, air talent cannot be personally fined for indecent speech.
- 16. If a listener wrote me upset about my telling an off-color joke on the air, I don't have to report her complaint to the FCC.
- 17. A listener sent an Eminem recording to the FCC that he claimed he heard on our station, but since we play only edited "cleansed" versions of popular music, we won't be fined.
- 18. The FCC won't even give you a break if something that was said on the air is a double entendre, or has a double meaning, one of which is "clean."
- 19. Double entendres in a foreign language are safe, like "Están cambiando el aceite" ("they're changing the oil" for a couple having sex).
- 20. The FCC will probably give us a break if we're the obvious target of a malicious letter and email-writing campaign resulting in hundreds of identical complaint "forms" being sent in.
- 21. The FCC will excuse exclamations of winners on a live call-in contest line, like "Holy shit!"
- 22. One of the infamous Seven Dirty Words has now become so accepted and commonplace in our language that it has been taken off the list.
- 23. If one morning show contains six different indecent "utterances," the FCC will consider fining the station for six violations, not just one.
- 24. If a morning show is syndicated on 50 stations, an indecent episode might result in 50 prosecutions, not just one.
- 25. If it's a network broadcast, the FCC won't go after the local station.

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T/F answers to **PART II** above:

- 1. FALSE. The law applies to the broadcast of any obscene, profane, or indecent material.
- 2. TRUE, theoretically. The law is not limited to English obscenity or profanity.
- 3. FALSE. Innuendo that conveys meaning and intent that is inescapable may be indecent.
- 4. TRUE. "Accidental utterances" does not mean that an utterance is not indecent.
- 5. FALSE. The law applies to the broadcast of any obscene, profane, or indecent material.
- 6. TRUE. The broadcast of indecent matter is prohibited between 6 a.m. and 10 p.m.
- 7. FALSE. Contemporary community standards are not local, but are national, in scope. The standard is that of an average viewer or listener, not of any individual listener.
- 8. TRUE. There is no exception for song titles to the prohibition of indecent matter.
- 9. FALSE. The prohibition on broadcasting indecent matter applies to any statement made by air personnel, comments made by callers-in, or lyrics sung or spoken by an artist.
- 10. FALSE. The indecency law makes no exception for news coverage.
- 11. TRUE. Depending whether material, whole or in context, was deemed patently offensive.
- 12. FALSE. If lyrics are understood and found to be patently offensive, they may be indecent.
- 13. FALSE. The FCC makes no distinction between a live and recorded broadcast.
- 14. FALSE. The FCC can levy up to \$32,500 for each indecent utterance, against each station. For serious and repeated offenses the FCC can initiate license revocation proceedings.
- 15. FALSE. The Communications Act prescribes conditions for imposing personal liability.
- 16. TRUE. Stations are not required to report the broadcast of matter that may be indecent.
- 17. NOT NECESSARILY. It is a question of proof. If a station cannot provide evidence of the broadcast of edited versions of music that may be deemed indecent in unedited form, the FCC could find that indecent material was broadcast.
- 18. TRUE. Because material uses double entendre or innuendo does not preclude the FCC from making an indecency finding, if the sexual or excretory import is unmistakable.
- 19. FALSE. Indecency law and FCC guidelines apply to all broadcasts regardless of language.
- 20. FALSE. The central question remains whether a broadcast is indecent.
- 21. FALSE. The circumstances of any utterance will be evaluated on a case-by-case basis.
- 22. FALSE. The FCC maintains no official list of prohibited words. The "Seven Dirty Words" were compiled by comedian George Carlin.
- 23. TRUE. The FCC can fine a station not just for the broadcast of a program containing indecent matter, but for each indecent utterance within a program.
- 24. TRUE. Each station has an independent liability.
- 25. FALSE. A complaint about network material may be made against a local station.

FCCA/FPR Member Agreement and Release

WFPR-LP FM, wfprofm, Franklin Public Radio (FPR) is a non-profit community radio station serving Franklin and neighboring communities. Franklin Community Cable Access, Inc. (FCCA, we/our/us) dba FranklinoTV is the parent organization of FPR and is a non-profit corporation. FCCA and FPR offices are located at 23 Hutchinson St., Franklin, MA 02038.

NOW, THEREFORE, IN CONSIDERATION for being allowed to participate as a member of WFPR, You hereby acknowledge and agree to the following:

All writings, recordings and forms of media that you generate as part of your activities at FPR (Works) are property of FPR and are retained under mutual copyright by both FPR and yourself.

You grant to FCCA, Franklin TV & wfprofm, a worldwide, non-exclusive, royalty-free license (including our right to sublicense) to use, copy, reproduce, process, adapt, modify, publish, distribute, transmit, and/or display your Works in any and all media or distributions, means and methods now known or later devised, including any manner FCCA deems appropriate for promotion, editing, synchronization with images, or adaptation for other publication, written or electronic, and to use your name(s), likeness, voice and biographical information in connection with any use of your Works. You waive any right to inspect or approve of such uses, and you agree to hold harmless, indemnify and release FCCA, its officers, employees, agents and assigns, affiliates and successors in interest, from all claims, actions, damages, liabilities, losses, and/or expenses, including reasonable attorneys' fees resulting from any breach or claim of breach that you, your heirs, executors or assigns may have at any time of any representations, warranties and agreements made herein.

You have read and you understand this handbook fully, and will adhere to all guidelines and rules described therein and by other posted notices, and that your participation in this activity is entirely voluntary. You further understand that as a volunteer you will not be covered by any health and/or accident insurance, and you, on behalf of yourself, your agents, heirs and next of kin, assume all risks, and you hereby release FCCA from any responsibility or liability for personal injury, including death and/or damage to, or loss of, your personal property, or arising from actions, causes of action, damages, or negligence which you may incur while you are engaging in any activity at or on behalf of FCCA.

FPR makes no guarantee to broadcast any program per any specific schedule. All programs are scheduled on a best efforts basis.

FPR may revoke your privileges at any time for any reason or for no reason. You understand that your failure to adhere to the terms of this agreement may result in your suspension or termination as a Member.

You will follow all directions regarding use of the facilities and equipment, and exercise care and good judgment when operating any and all equipment, and to report any malfunction as an Equipment Trouble Report.

You will be responsible for the proper use and safety of equipment and recordings while you are engaged in your activities at FPR. You understand that you have both the right and obligation to ask anyone his/her name and purpose for being in the building, and to ask anyone having no legitimate purpose to leave the premises at once.

You will maintain Station and Program Logs, including scheduled on-air announcements.

You will notify a manager in advance if unable to appear or work as scheduled.

You will properly return and file all physical recordings borrowed from the FPR library.

You will not download or copy for personal use any digital files from the FPR library.

You will be sober when you are signed in as the on-duty operator.

You and all guests that you invite will adhere to all FCC rules and regulations.

You will timely inform the management of any change of address or phone number.

You will maintain your volunteer member status as described in FPR's Handbook.

You will act and present yourself in a professional manner at all times when representing FPR. This includes your behavior on-air, on the phone, and whenever interacting with the public.

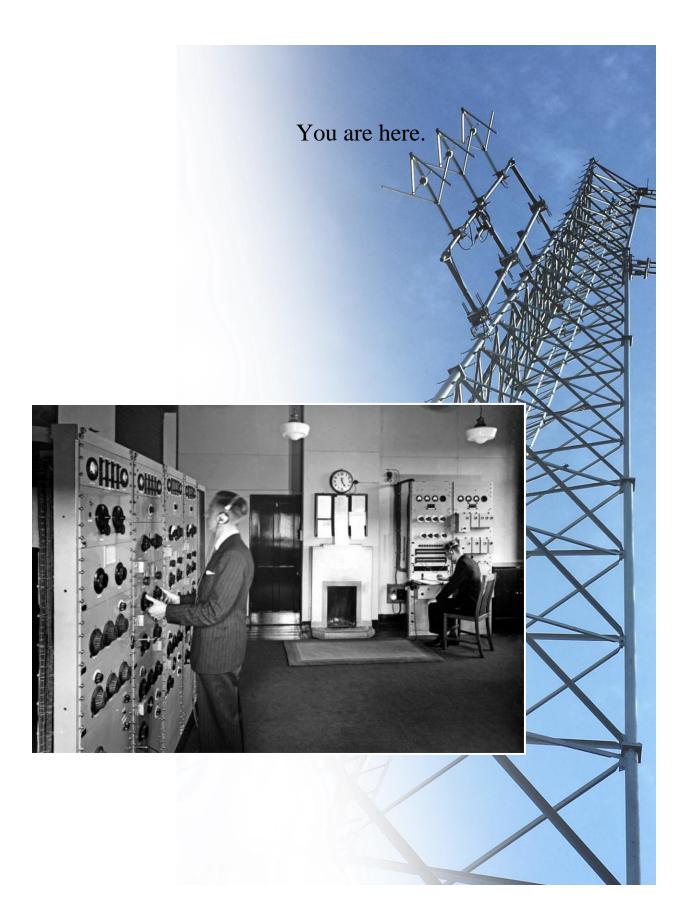
Sign your statement of acceptance below:

Parent/Guardian Signature and Printed Name

I, the undersigned, am competent to sign this agreement and release. I have read the entire handbook carefully and understand and agree to the terms and conditions.	
Date:	
Volunteer Signature and Printed Name	
Address, City, State, Zip Code	
Email Address, Contact Phone Number(s)	
NOTICE: Volunteers and participating visitors under eighteen (18) years of age must have this agreement co-signed by their parent or guardian.	
This is to certify that I, as parent/guardian with legal responsibility for this volunteer/visitor, do consent and agree to his/her release as provided above, and for myself, my heirs, assigns, and next of kin, I release and agree to indemnify and hold harmless FPR and FCCA from any and a liabilities incident to my minor child's involvement as a volunteer to FPR.	
Date:	



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