



**Welcome to “Navigating the Online
Public Inspection File” Webinar
(April 2019)**

Thank you for joining us.

**The presentation will begin shortly.
Please make sure that the volume on your computer’s
speakers is turned up.**

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In cooperation with:



What Will Be Covered in the Webinar:

- **Online Public Inspection File (OPIF)**
- **What Needs to be Uploaded**
- **Consequences of Non-Compliance**
- **Relevance To License Renewals**
- **Question/Answers**



Public Inspection Files: A History

- Historically were maintained on paper or on computers in their studios
- Were only available to the public during regular business hours
- Relevance to license renewal applications



UPDATE

In 2012, new FCC Rules created the OPIF System

- Hosted by the FCC
- Available to everyone 24/7 on the web
- Automatic uploads of certain items

FCC phased-in OPIF requirements based on service/markets:

August 2012

- Top 50 market TV stations affiliated with the Big 4 Networks

July 2014

- All Remaining TV Stations

June 2016

- Top 50 Market Radio Stations
(except non-commercial or less than five full-employees)

March 1, 2018

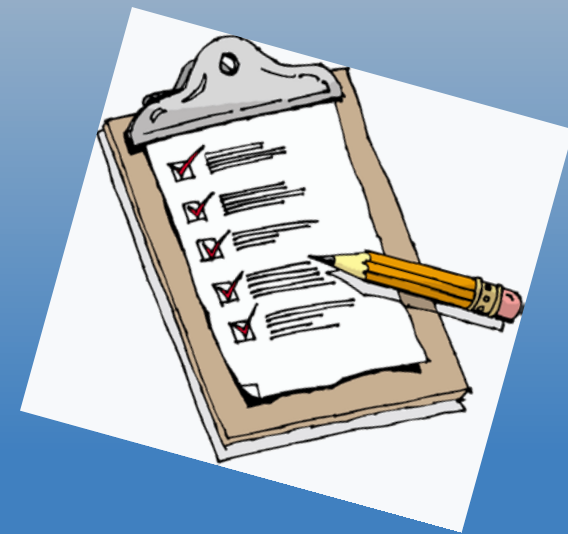
- All Remaining Radio Stations

Quick Refresher (How to access the Online Public File):

(Watch our 2017 Webinar on [YouTube](#) for Details)

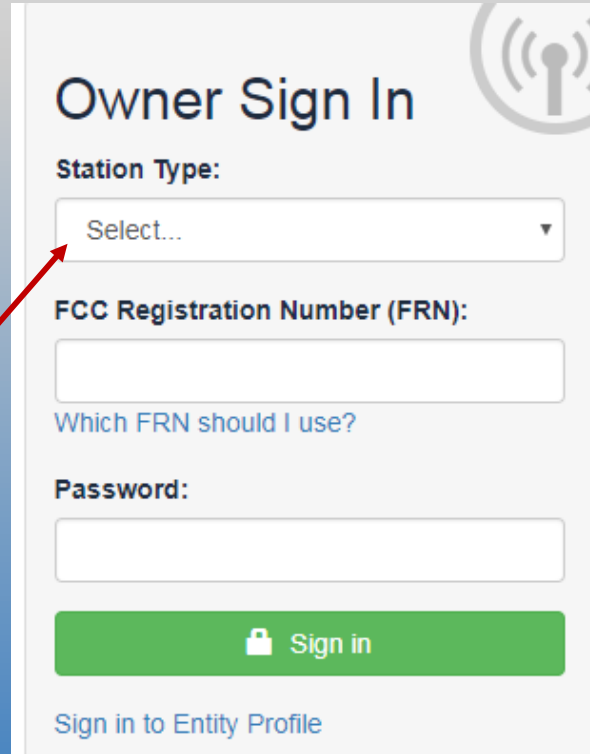
What you will need:

1. The FCC Registration Number (FRN) for the Licensee (10 digit number)
2. The FRN password



Log into the FCC's OPIF system's "Owner Dashboard"

<https://publicfiles.fcc.gov/admin/owner-login>



The screenshot shows the "Owner Sign In" form. It includes a "Station Type" dropdown menu with "Select..." as the current selection. Below this is a text input field for the "FCC Registration Number (FRN)". A blue link "Which FRN should I use?" is positioned between the FRN field and the "Password:" field. At the bottom, there is a green "Sign in" button with a lock icon and a link "Sign in to Entity Profile". A red arrow points from the text on the left to the "Station Type" dropdown menu.

In the drop-down
menu for Station
Type, choose:
"TV/FM/AM"

After you sign in, you will see all of the licensee's stations listed by call sign

Station 1	Station 2
<p>LOGO NOT AVAILABLE</p>	<p>LOGO NOT AVAILABLE</p>
<p>Call Sign: KRGI Entity ID: 32382 Service Type: AM Community: GRAND ISLAND, NE Channel:</p>	<p>Call Sign: KOLT Entity ID: 67471 Service Type: AM Community: SCOTTSBLUFF, NE Channel:</p>
<p>Access Token: ce16f173- 1079-bd4c- d48d- 634bc569ceb2</p>	<p>Access Token: 4db2bb61- 83a8-6a17- 2565- a9952b1c3fc9</p>
<p>Passcode: IcYcnH6m</p>	<p>Passcode: oLEP3W6o</p>
<p>Generate New Passcode</p>	<p>Generate New Passcode</p>

Tips

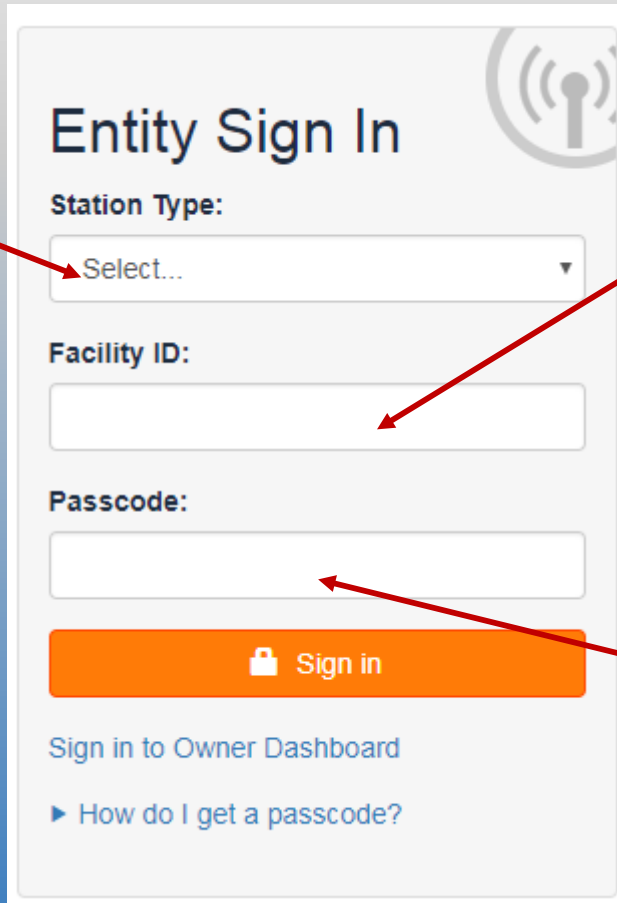
- Note that the “Entity ID” = “Facility ID” which is a unique number for each station
- The Passcode is assigned by the FCC and is not customizable by you (no vanity plates)
- Entity ID number and Passcode are needed every time you sign in to upload new information



Station Log in at

<https://publicfiles.fcc.gov/admin/>

Select the appropriate station type in the dropdown menu (e.g. AM or FM)



The form is titled "Entity Sign In" and features a radio tower icon in the top right corner. It contains three input fields: a dropdown menu for "Station Type" with "Select..." as the placeholder, a text box for "Facility ID:", and a text box for "Passcode:". Below these fields is an orange "Sign in" button with a lock icon. At the bottom, there is a link "Sign in to Owner Dashboard" and a link "How do I get a passcode?" with a right-pointing triangle icon.

Enter the Facility ID Number (i.e. Entity ID from the Owner Dashboard)


Enter the passcode

Once signed into a station's OPIF, you will see the following:

AM Radio Information

? **What's in here?** (as required by § 73.3526(e)(1), § 73.3527(e)(1)) (retain until replaced). These are the instruments issued by the Commission to individuals or companies that authorize broadcasting or other use of tv transmissions in connection with broadcasting and include licenses and permits to construct or modify broadcast facilities.

Basic Info [Additional Documents](#)

Status: **LICENSED**  [View License Authorization](#)  [View Other Authorization](#)
Expires: 06/01/2021
Status Date:

Facility Id:
Community of License:
Service: AM Station

Licensee Address:

Main Studio Address: N/A

Public Inspection File Archive

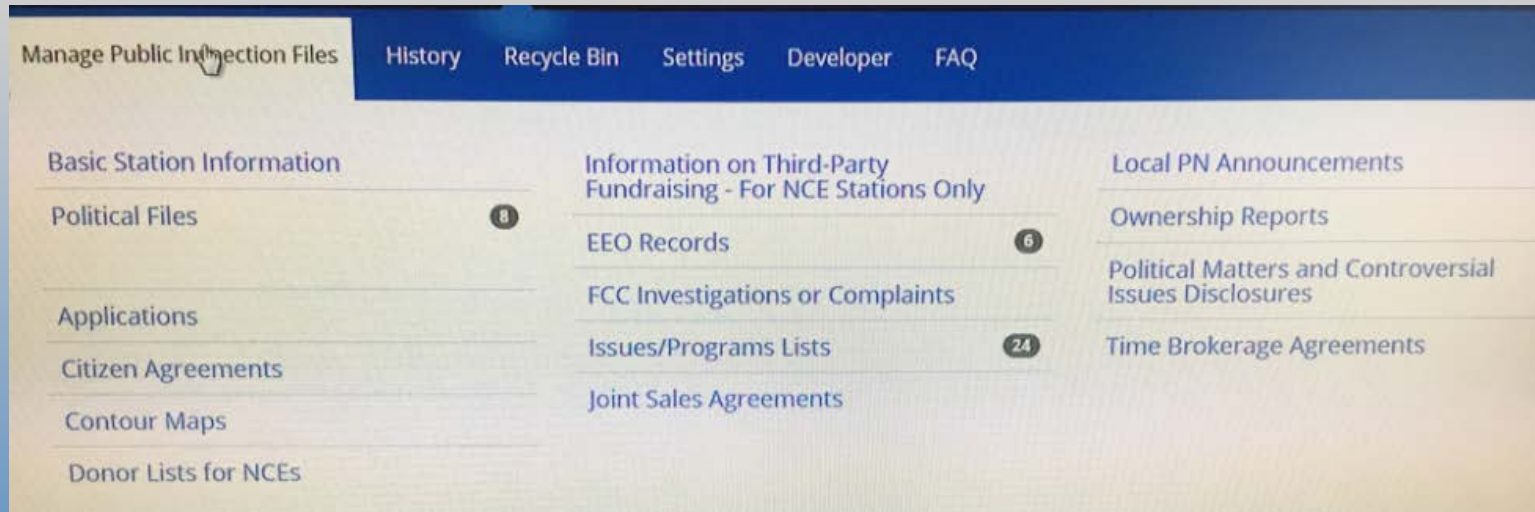
General Resources  [The Public and Broadcasting Manual](#)

At the top of the page there will be a banner with the following options:



- Mouse over the “Manage Public Inspection Files” wording to see all of the folders set up by the FCC to which you may upload documents
- Note that the FCC has done most of the work for you already

Here's an example (for an AM radio station) of the available folders that pop up when placing your cursor over "Manage Public Inspection Files"



The screenshot shows a web interface with a dark blue header bar. The main menu item "Manage Public Inspection Files" is highlighted, and a dropdown menu is visible. The dropdown menu is organized into three columns of folder links. The first column includes "Basic Station Information", "Political Files" (with a badge of 8), "Applications", "Citizen Agreements", "Contour Maps", and "Donor Lists for NCEs". The second column includes "Information on Third-Party Fundraising - For NCE Stations Only", "EEO Records" (with a badge of 6), "FCC Investigations or Complaints", "Issues/Programs Lists" (with a badge of 24), and "Joint Sales Agreements". The third column includes "Local PN Announcements", "Ownership Reports", "Political Matters and Controversial Issues Disclosures", and "Time Brokerage Agreements".

Column 1	Column 2	Column 3
Basic Station Information	Information on Third-Party Fundraising - For NCE Stations Only	Local PN Announcements
Political Files (8)	EEO Records (6)	Ownership Reports
Applications	FCC Investigations or Complaints	Political Matters and Controversial Issues Disclosures
Citizen Agreements	Issues/Programs Lists (24)	Time Brokerage Agreements
Contour Maps	Joint Sales Agreements	
Donor Lists for NCEs		

Click on one of the pre-set folders (for example: Joint Sales Agreements) and you see the following:

Joint Sales Agreements

? **Rule § 73.3526(e)(16)**

? **Retention** *As long as contract or agreement in force.*

? **What's in here?** These are contracts or agreements that allow one or more parties other than the station's owner to sell advertising time on the station. Confidential or proprietary information may be redacted from these documents.

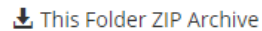
Note: You are uploading documents into an official FCC system. All information submitted will be publicly available via the web. Filers may want to redact confidential or proprietary data before uploading, including customer bank account information.

Q: Why are my files still "pending"?

Browse → Joint Sales Agreements →

 Upload Documents

 New Folder

 This Folder ZIP Archive

Name	Size	Date Uploaded	Status	Actions
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No data available in table

Showing 0 to 0 of 0 entries

To upload documents, click orange button “Upload Documents”

After clicking Upload Documents you will see the following:

Joint Sales Agreements

? **Rule § 73.3526(e)(16)**





? **Retention** *As long as contract or agreement in force.*

? **What's in here?** These are contracts or agreements that allow one or more parties other than the station's owner to sell advertising time on the station. Confidential or proprietary information may be redacted from these documents.

Note: You are uploading documents into an official FCC system. All information submitted will be publicly available via the web. Filers may want to redact confidential or proprietary data before uploading, including customer bank account information.

Q: Why are my files still "pending"?

Folder Path: *Joint Sales Agreements*

Drop files here, or click to upload. You may upload 15 files at a time. Maximum size is 15MB per file.
Accepted formats: PDF, DOC(x), RTF, XLS(x), TXT.

Drag and drop, or click "Add files . . ." button

Under “Additional Documents” tab you will see:

AM Radio Information

What's in here? (as required by § 73.3526(e)(1), § 73.3527(e)(1)) (retain until replaced). These are the instruments issued by the Commission to individuals or companies that authorize broadcasting or other use of tv transmissions in connection with broadcasting and include licenses and permits to construct or modify broadcast facilities.

Basic Info **Additional Documents**

Licensees should upload any additional material that relates to an application filed with the Commission in the folder below that corresponds to the type application at issue.

Note: You are uploading documents into an official FCC system. All information submitted will be publicly available via the web. Filers may want to redact confidential or proprietary data before uploading, including customer bank account information.

Q: Why are my files still “pending”?

Browse → [FCC Authorizations](#) → **Additional Documents** →

[Upload Documents](#) [New Folder](#) [This Folder ZIP Archive](#)

Name	Size	Date Uploaded	Status	Actions
No data available in table				

Showing 0 to 0 of 0 entries

A common **mistake** is uploading **everything** to this folder



Content of Public Inspection Files



- **FCC Authorizations** -- *Automatically uploaded by the FCC*
- **Applications and related materials** -- *Automatically uploaded by the FCC when filed electronically by the licensee (note Form 302-AM license application is still filed on paper)*
- **Contour Maps** -- *Automatically uploaded by the FCC*
- **Ownership Reports** -- *Ownership reports automatically uploaded by the FCC, but other corporate documents (or a list thereof) must be manually uploaded*

- **Equal Employment Opportunity File** - Stations employing five or more full-time employees are required to maintain in their public inspection file the following reports regarding their EEO activities:
- An annual EEO public file report prepared on the anniversary of the station's license renewal application deadline -- *Must manually upload*
 - Audit Responses -- *Must manually upload*
 - FCC Forms 396, 397, 396-A -- *Automatically uploaded by FCC*



- **Political file** (retain for two years): All requests for advertising time by candidates and certain issue advertisers, final dispositions or "deals" agreed to with the candidate/advertiser
 - Include description of when advertising actually aired, advertising preempted, and the timing of any make-goods of preempted time, as well as credits or rebates provided by the candidate/advertiser
 - *Going forward new political files must be manually uploaded*
 - *Radio station political files existing prior to March 1, 2018 are not required to be uploaded to the OPIF (but may be manually uploaded by the licensee)*



➤ **Political File (Continued)**

- Stations must maintain backup copies of their political files in the event that the Commission's OPIF system is unavailable (example: Federal Government shut-down) -- the backup copies must be made available to the public either on the station's website or on paper (or computer) at a physical location
- If a station has no political advertising for a year, consider uploading a statement to that effect to the OPIF, so it doesn't appear the station is merely noncompliant

- **Political Matter and Controversial Issues of Public Importance, Sponsor Identification** (Political matter or matter involving the discussion of a controversial issue of public importance)
 - *Radio stations as of 3/1/2018 going forward new public and political files must be manually uploaded to the station's OPIF*
 - *Existing political files are not required to be manually uploaded to the OPIF*



- **FCC investigations and complaints** -- *Must manually upload (but check with your lawyer first, before uploading)*
- **The Public and Broadcasting manual** -- *Automatically uploaded by the FCC*
- **Citizen agreements (Rare)** -- *Must manually upload*



- **Issues/Programs lists** (Quarterly lists of programs aired during the preceding quarter that provided the most significant treatment of community issues) -- *Must manually upload*
 - Should include title of program, date, time and duration, contents and indicate which local issue the program addressed
 - Should be issues of local importance

- **Donor lists for non-commercial educational** (Lists of donors that have supported specific programs) -- *Must manually upload*



- **Local public notice certifications and announcements** (For license renewal notices only) -- *Must manually upload*
- **Time Brokerage Agreements** (Sometimes referred to as Local Marketing Agreements or LMAs) -- *Must manually upload*
- **Joint Sales Agreements** -- *Must manually upload*
- **Shared Services Agreement** – (New as of March 23, 2018 – older SSAs should have been uploaded by Sept. 19, 2018) -- *Must manually upload*



- **Information on Third-Party Fundraising** (New as of November 13, 2017 Noncommercial stations only that interrupt regularly scheduled programming to conduct fundraising activities for other non-profit organizations must place in the OPIF quarterly reports detailing such activities – date, time, duration, type of fundraising, name of benefiting non-profit, cause benefitted and approx. amount of money raised) -- *Must manually upload*



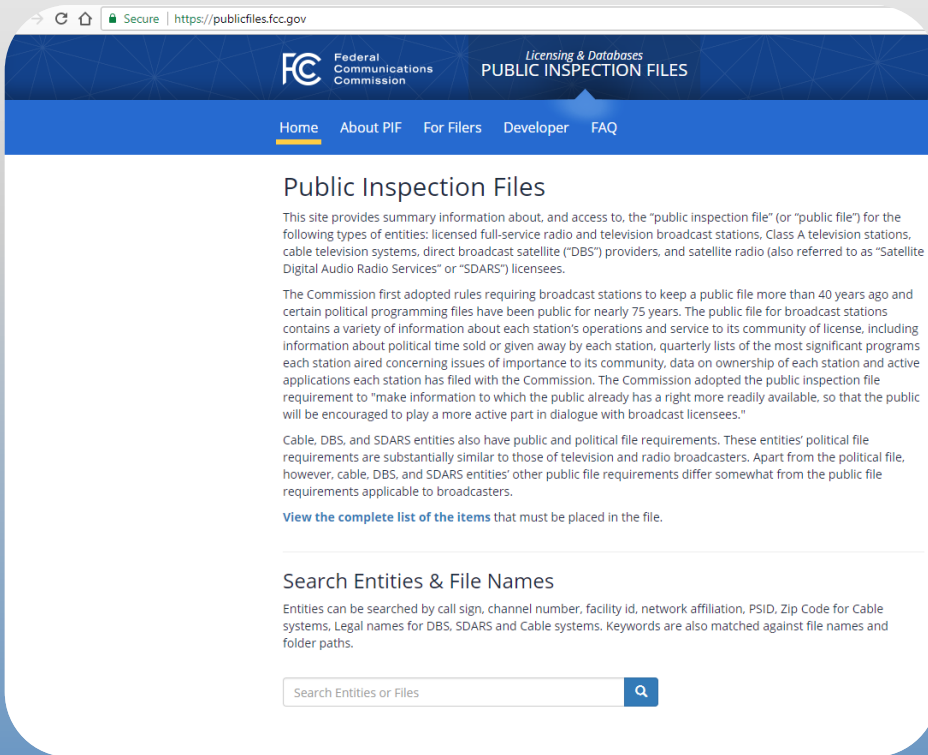
TV-Specific Contents:

- **Children's programming records** -- Commercial TV stations' compliance with the Children's Television Act of 1990 and the FCC's limits on advertising during TV programming that is directed to children 12 and under)
 - **Form 398 Children's Programming Reports** Filed electronically quarterly identifying a TV station's programming designed to serve the educational and informational needs of children -- *Automatically uploaded by FCC*
 - **Children's Commercial Limits Material** -- Records sufficient to permit substantiation of the TV station's certification in its license renewal application that it is in compliance with the commercial limits on children's programming -- *Must manually upload*



- **Must-Carry or retransmission consent elections** (Statements of a TV station's election to be carried on cable systems or direct broadcast satellite services, either by negotiated retransmission consent agreements or by mandatory carriage under the Commission's rules) – *Must manually upload*
- **Auction Transition Consumer Certification** (certification of compliance with viewer notification requirements for post-incentive auction repack channel changes) – *Must manually upload*
- **Continuing Class A TV eligibility documentation** (Documents of continuing eligibility of a low-power television station for Class A status) – *Must manually upload (we recommend uploading quarterly with issue/programs lists)*





The screenshot shows the FCC's Public Inspection Files webpage. The browser address bar displays "Secure | https://publicfiles.fcc.gov". The page header includes the FCC logo and the text "Federal Communications Commission" and "Licensing & Databases PUBLIC INSPECTION FILES". A navigation menu contains "Home", "About PIF", "For Filers", "Developer", and "FAQ". The main content area is titled "Public Inspection Files" and contains several paragraphs of text explaining the purpose of the site and the types of entities covered. A search box is located at the bottom of the page.

Public Inspection Files

This site provides summary information about, and access to, the "public inspection file" (or "public file") for the following types of entities: licensed full-service radio and television broadcast stations, Class A television stations, cable television systems, direct broadcast satellite ("DBS") providers, and satellite radio (also referred to as "Satellite Digital Audio Radio Services" or "SDARS") licensees.

The Commission first adopted rules requiring broadcast stations to keep a public file more than 40 years ago and certain political programming files have been public for nearly 75 years. The public file for broadcast stations contains a variety of information about each station's operations and service to its community of license, including information about political time sold or given away by each station, quarterly lists of the most significant programs each station aired concerning issues of importance to its community, data on ownership of each station and active applications each station has filed with the Commission. The Commission adopted the public inspection file requirement to "make information to which the public already has a right more readily available, so that the public will be encouraged to play a more active part in dialogue with broadcast licensees."

Cable, DBS, and SDARS entities also have public and political file requirements. These entities' political file requirements are substantially similar to those of television and radio broadcasters. Apart from the political file, however, cable, DBS, and SDARS entities' other public file requirements differ somewhat from the public file requirements applicable to broadcasters.

View [the complete list of the items](#) that must be placed in the file.

Search Entities & File Names

Entities can be searched by call sign, channel number, facility id, network affiliation, PSID, Zip Code for Cable systems, Legal names for DBS, SDARS and Cable systems. Keywords are also matched against file names and folder paths.

Search Entities or Files

Check out your own and the OPIFs of other stations

Go to this FCC webpage and enter the call sign of your favorite station: <https://publicfiles.fcc.gov/>



- Any station with a website **MUST** include a home page link to the first page of its OPIF
- Contact information for a representative who can assist any person with disabilities accessing the content of the public file must also be on the station's website home page

- If you have a main studio (even though main studio requirement has been repealed) add the address & phone # to the OPIF

To add the studio address & phone number:

1. After logging into the “Entity Sign In” page there’s a tab at the top labeled “Settings”
2. Click that tab and on the next page go to the tab Main Studio Contact
3. Fill in the address and phone number, then save the changes

Consequences of Non-Compliance

Your OPIF is now accessible to anyone at any time from the anonymous comfort of an office/home/cave/bunker:

- disgruntled former employees;
- competitors;
- public interest groups;
- political advertising consultants; and
- THE FCC!!!

The system not only shows *if* you have uploaded required items, it shows *when* those items were uploaded. The FCC's rules may require certain OPIF items to be uploaded at specific times.

Consequences of Non-Compliance *Continued...*

The FCC's staff will audit online public files when reviewing applications.

One of the questions in the license renewal application form is:

- Licensee certifies that the documentation, required by 47 C.F.R. Section 73.3526 or 73.3527, as applicable, has been placed in the station's online public inspection file *at the appropriate times*. Yes or No.

If the answer is “No” the applicant must submit an exhibit with an explanation

Consequences of Non-Compliance *Continued...*

What if you are missing old OPIF materials or were late uploading them???

Remember your Mother's advice: It's better to tell the truth and face the consequences, than to lie and get caught.

- Many stations are non-compliant (i.e. missing OPIF materials and/or late in uploading required items)
- FCC staff recommends that if old materials are missing, use every possible effort to recreate them and upload them ASAP, at least before filing your license renewal application
- We are not sure yet what the FCC's punishment for missing/late materials will be – fines? compliance program? short-term renewal?

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