FCC Proposes Plan for Reimbursing Repack Costs

This is an update about the Federal Communication Commission's (FCC) proposed plan for reimbursing radio stations for the effects of the TV spectrum repack. The FCC recently proposed rules for reimbursing radio stations affected by the TV spectrum repack and new channel assignments. The FCC proposed different levels of reimbursement for different categories of radio stations, along with a number of rules for eligible costs.

In August, NPR Distribution sent an email to all interconnected general managers outlining the situation and asking for them to participate in a survey that will help us continue to advocate on behalf of stations.

Again, we are asking all to please complete this survey at https://www.surveygizmo.com/s3/4532607/2018-TV-Repack-Impact-for-Public-Radio if your station shares a tower with a repacked TV station or is affected by the TV repack.

We'll use the information about how your station is impacted and your best estimate of anticipated costs in our interactions with the FCC to maximize reimbursement for affected public radio stations. The deadline for completion is September 7. (Even if you responded to our survey last winter, please complete this new survey too, because the updated information we're seeking reflects the new FCC proposal).

Background: The FCC's recent spectrum auction for television frequencies didn't involve radio broadcast spectrum, but the TV repacking process can affect radio stations if their transmitter antennas are located on or near a transmission tower for a repacked TV station.

Earlier this year, Congress authorized an additional $1 billion funding over two years to reimburse broadcasters affected by the TV repack and, for the first time, authorized reimbursement for radio stations, LPTV stations and translators. Congress directed the FCC to reimburse "costs reasonably incurred" by a radio broadcast station for facilities necessary "to reasonably minimize disruption of service" as a result of the TV repack. Congress prohibited reimbursement for "lost revenues" and prohibited duplicative payments if radio stations have received payment for interim facilities by another source.

We have updated our FAQ on the FCC proposed plan, which you can view here: https://bit.ly/2NhiP2o
FCC Proposed Rules. The FCC proposed the following types of eligible radio stations and reimbursable expenses:

• Radio stations forced to vacate their towers, relocate their antennas to a different level of their current towers, temporarily dismantle equipment, or make other equipment changes to permit work on a TV antenna/tower or to accommodate new TV transmission equipment would be reimbursed up to 100%. Eligible costs include: equipment to replicate or restore service, costs to move equipment, tower and construction work, and related professional services (such as engineering). Stations would be required to reuse their own equipment to the extent possible, and would not be reimbursed for new, optional features that aren't in the equipment being replaced.

• Radio stations forced to temporarily reduce power or go off air to protect workers and accommodate antenna or tower modifications could incur costs to build new auxiliary facilities or to modify existing auxiliary facilities to permit continued broadcasting while primary facilities are off the air. The FCC proposes to reimburse such costs only if they're needed to avoid service interruptions that exceed ordinary construction or maintenance requirements. Notably, the FCC proposes a graduated priority system of reimbursement based on the time of day and number of days the station is off air due to the repack:

  - Stations off-air less than 24 hours, off-air only during hours from 10:00 p.m.- 6:00 a.m., or off-air less than five non-peak broadcast hours per day: No reimbursement.
  - Stations off-air for 24 hours to 10 days: Reimbursed up to 50% of eligible costs.
  - Stations off-air for 11 days to 30 days: Reimbursed up to 75% of eligible costs.
  - Stations off-air for more than 30 days: Reimbursed up to 100% of eligible costs.

The FCC proposes that 80% of the station's coverage area or covered population should be replicated by the interim facility to constitute "reasonably minimal disruption" of service (stating that near-exact replication of a station's coverage area from an alternative site in most cases would be too expensive).

If the station is required to lease tower space for a new auxiliary facility, only tower lease payments during the period when the repack construction work is actively preventing the radio station from broadcasting from its primary facility would be reimbursed. Radio translators are not eligible to apply for auxiliary facilities, but would be eligible for reimbursement requesting either a temporary facility modification or special temporary authorization to broadcast from an interim site.

Under the FCC proposed rules, radio stations seeking reimbursement would have to file a number of forms and supporting documents to certify eligibility, estimate costs, and seek reimbursement, a process that could be complicated and time-consuming. The FCC is considering prioritizing reimbursement of certain costs, such as equipment and engineering expenses, over other types of expenses, such as project management fees, in case there aren't sufficient funds to cover all eligible expenses.

Thank you for your help with the survey! Please contact us [prsshelp@npr.org or 1-800-971-7677] if you have any questions or comments.

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**Future Systems Project to Stretch Beyond 2021**

The PRSS’ effort to develop and implement the future distribution system of public radio is well underway. It is an effort that began more than a year ago and will unfold, with multiple milestones, through the end of 2021.

In the coming months and years, EsPRSSo will provide features and updates on the Future Systems project so that the PRSS community is familiar with where we are in the process.

Below is a timeline of activities that we have on the horizon. Please note that all dates are tentative and
subject to change.

**CPB funding contract for Future Systems project** - Completed April 2018

**Move to Single Transponder** - Completed June 2018

**Head-End Selection** - Completed Request for Proposal and vendor selection in Q2 2018. Vendor contract to be awarded and announced in Q4 2018.

**Build & Go Live** - To begin in Q1 2019 and will include:

- Order and upgrade non-head-end vendor equipment in preparation for new interconnection system
- Order head-end system for all environments
- Perform testing on all environments for NOC & BuNOC
- Beta test new interconnection system with selected stations
- Roll out new receivers to stations (see receiver rollout project phase)
- Conduct dual mode for new and old interconnection systems for
- Cutover to new receivers
- Decommission old system

**Receiver Rollout**: Planned for Q4 2019 through Q1 2020

- Roll out receivers to all stations

**Ground System Update**: Planned for Q1 2020 through Q4 2021

- Perform station study to identify stations in need
- Provide upgrade for stations in need

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**The News**

**Music Alliance Executive Director Shares Vision**

In May, the noncomMUSIC Alliance launched in an effort to support and celebrate public radio's role in connecting musicians, performers and artists with its listeners. The alliance was created to boost awareness of musical offerings available from noncommercial public radio.

In a conversation with EsPRSSo, NPR VP of Policy & Representation Mike Riksen, who is also executive director of the noncomMUSIC Alliance, talked about this new initiative and its goals for public radio.

**Why was the noncomMUSIC Alliance created?**

Public radio is well known for our news service, but our role in music is underappreciated and under-promoted. We need to better champion the unique work of our music stations and how they're embedded in America's musical vitality. There are music organizations that represent the interests of artists or labels and performance rights organizations, but none works exclusively to represent noncommercial, not-for-profit public radio music. We want to fill that void.
The noncomMUSIC Alliance celebrates public radio’s role in connecting musicians, performers, and artists with audiences that enjoy and support their music. The Alliance highlights the work of noncommercial public radio as an essential source of music discovery, curation, preservation, performance, and community.

Why is it necessary to form an advocacy group on behalf of public radio music?

We've built the Alliance to boost noncom music's unique role in the music industry by:

- Raising awareness of noncommercial music and its public service mission with listeners and public policy makers. As I mentioned earlier, the public knows and recognizes public radio for our news service, and we want to bring that same level of recognition to the one-of-a-kind music that can only be found on public radio.

- Advocating on behalf of noncommercial music in legal and regulatory issues.

- Uniting public radio stations, listeners, artists, and other music industry leaders who value noncommercial music. It is essential to have related stakeholders voice their support for initiatives that will ultimately benefit our stations and the day-to-day work they do.

- Serving as a resource for stations and others. Once a station signs up to become a partner they will gain access to the information and resources in the noncomMUSIC Alliance Partner Portal.

How are you going about soliciting new stations to join? Are you targeting any stations or geographical regions or formats in particular?

All stations that have music as their primary or as a significant part of their formats are welcome to join us. We need all stations to participate to be successful. Our launch in May, with more than 70 partners spanning jazz, classical, and Triple A across the U.S., got us off to a quick start. We now have more than 100 partner stations.

To ensure that we stay connected with our partners, we've established our fantastic advisory council:

- Brenda Barnes, KING-FM
- Abby Goldstein, WYEP
- Nick Kereakos, American Public Media & Minnesota Public Radio
- Roger LaMay, WXPN
- Tom Mara, KEXP
- Judy McAlpine, USC Radio group
- Amy Niles, WBGO

We were intentional in selecting advisers representing all musical genres from across the United States. We want the council to reflect our incoming partners because we need the strength of every public radio station that plays music to join us. And to be clear, you do not have to be an NPR member station to join.
In the next year, we will expand our partnership to include artists, performers, community leaders, listeners and other noncommercial music enthusiasts who can advocate on our behalf. We'll need our partner stations, of any musical genre from across the U.S., to help us achieve that goal.

Why would a station join? What's the benefit for them, individually and as a member of the national interconnected system?

We want to champion the great work they're doing by telling their stories and giving them a platform to showcase the impact they have in their communities.

We have created a digital forum for our partners to connect. We realize the benefit of getting to know colleagues, sharing ideas, and having conversations. The forum allows us to talk with partners and allows our partners to have meaningful connections with their peers.

We also organize webinars and in-person meetings with stations, and are responsive to our partners' needs. If there's something that isn't in our Partner Portal that our stations would find useful, we want to know about it and create the resources they need.

What type of policy changes can stations expect the Alliance to lead?

Our initial efforts will focus on seeking improvements in the legal landscape so that music rights and licensing negotiations aren't so burdensome for noncommercial radio. As public radio stations seek to expand their online, interactive, digital audio and video music programming, it can be a significant challenge to navigate the complicated, cumbersome, and costly copyright laws.

The complexity of digital music rights is a barrier to innovation on new digital platforms. We're working to streamline the music licensing system across platforms, so stations can embrace multiple traditional and digital programs to connect their audiences with new music and artists.

What should stations expect if they get involved? Is there any kind of commitment, of time, finances, or otherwise?

There is no financial commitment. However, we do require a bit of time and active participation once stations join. First, we ask stations that join to take our partner survey. We are gathering information about noncommercial radio to understand the issues that are important to stations. We ask for details on the types of programming our stations do, the number of live performance stations produce in-studio and in their communities, and how they distribute programming (e.g. streaming, podcasts, or video). We plan to use the data to tailor the Alliance's top priorities and create additional materials such as infographics, a white paper, and social media images.

Second, the Alliance will only be successful with the help of our stations so we ask that they share why they have joined the Alliance, encourage their listeners to sign up, and recruit colleagues who have not signed up. To make this easier, we have created social media scripts, digital assets, and recruitment materials that are available in the Partner Portal for stations to download and customize for their profiles and websites.

How can a station to get involved?

Stations can sign up to be partners online at noncommusic.org/partner-request. They can also follow us on Facebook, Twitter, and Instagram. If stations have any questions, I encourage them to contact me or my colleagues Joni Lupovitz and Anne Standley.
PRSS Customer Satisfaction Survey Has Opened

The annual PRSS Customer Satisfaction Survey was sent to all interconnected general managers on September 5, 2018, and we ask that all GMs please take a moment to let us know how we are doing in serving you and your operation.

The annual survey is an important tool for NPR Distribution to gauge the level of service we provide and the degree to which we respond to questions and complaints, communicate important information and events, and provide a value for your interconnection fees.

Many of the improvements made to ContentDepot and other services have been a result of feedback and comments made on the survey. The results are also shared with the D/I Committee and serve to guide its decision-making and planning for the following year and beyond.

We appreciate those who take the time to give us their perspectives on the survey. If you are a GM and did not receive an email with a link to the survey, please send an email to Erich Shea at eshea@npr.org.

Tips 'n' Tricks

Upgrade Applies Drag & Drop Across ContentDepot

The ContentDepot received an upgrade on August 14, 2018, with improvements made to segment upload as well as the search function.

Over the past few months, the 'Drag and Drop' function has been continuously enhanced to make uploading of files easier for users. The D&D function has now been added to Program Clock, Program Promotional Materials, Compose Message Attachment, Episode image, Episode promotional materials, and Episode rundowns. At this point, the new uploader has been implemented to nearly all applicable areas of ContentDepot's user interface.

The search function has also been improved. Now if a user conducts a search, the results offered will include only new and active programs rather than past or cancelled shows. This will clean up the results page and make it easier for users to select the programs they want.

With regard to MetaPub, we have added letterboxing to HD images, which allows metadata to conform to the 170x170 square dimension, making it ideal for HD radio displays.

NPR Distribution continues to perform design and integration enhancements to ContentDepot in preparation for the new features that will be available in the future distribution system. These pieces will be detailed in future editions of the newsletter.

If you have any questions or comments, please contact the PRSS Help Desk at 800.971.7677 or prsshelp@npr.org.
What's New in the ContentDepot?

There are several new programs (both recurring and one-time-only) appearing in the ContentDepot this month. Listed below are details on a sampling of new regularly occurring programs that your listeners may enjoy:

**Brains On: The Science of Cooking** - A one-hour, one-time-only special from **American Public Media** that breaks down the four elements essential to cooking: mix, chop, heat and chill.

**Marketplace: Divided Decade** - A one-hour, one-time-only special from **American Public Media** that looks at the past ten years since the 2008 financial crisis.

**Armistice Day: Music from the Trenches** - A one-hour, one-time-only special from **American Public Media** that provides music spanning WWI through the signing of the armistice from both sides of the Atlantic.

**The Politics Show from NPR** - A new one-hour, weekly show from **NPR** that provides a roundtable discussion performing a deep dive on the major races, themes and issues for the 2018 midterm elections.

**The Science of Happiness at Work** - A one-hour, one-time-only special from **PRI** that looks at the newest research that illuminates what makes our jobs more meaningful, engaging and fulfilling.

**70 Million** - A new half-hour, weekly show from **Lantigua Williams & Co.** that documents the 70 million Americans with a criminal record and how residents and communities are taking up the challenge of reforms.

**A Line Divides: 100 Days Since Zero Tolerance** - A one-hour, one-time-only show from **KQED-FM** that looks at the Trump administration's zero tolerance policy, the crackdown on immigration, and the separation of families who attempted to cross the border.

**Chanticleer Christmas** - A one-hour, one-time-only special from **American Public Media** that presents holiday favorites, new and old, performed by an "Orchestra of Voices."

Stay in Touch

We Want to Hear From You!

EsPRSS-O welcomes and encourages your questions, comments, suggestions and ideas.

- Have you or your team developed a particularly unique and/or nifty technique in operating ContentDepot?
- Are you facing any new challenges and want to get the perspective of others who might be in a similar situation?
- Are you seeing any technology or business developments on the horizon that your pubradio colleagues ought to know about?
- Got a notion on your mind that you want to share with the PRSS?
If so, don’t hesitate, write in today!

Send any and all correspondence to PRSSCommunications@npr.org along with info on the best way to get in touch with you.

Stay in touch! Send your questions, comments and ideas to PRSSCommunications@npr.org. As always, the PRSS Help Desk is also available 24/7 at 800.971.7677 or email PRSSHelp@npr.org.