

Having a show on WOOL is a privilege with responsibilities.

The station broadcasts under a federal license that can be revoked. Short of revocation, the FCC can and will issue large fines for breaking the rules — and in the host contract you sign with the station, you agree to be responsible for any fines issued due to your actions.

These are notes were from a refresher meeting of WOOL hosts. Certain FCC laws and inside policies have changed since that meeting, and this document has been updated to reflect those changes (in early 2018). It doesn't cover everything, just certain policies and procedures that had been occasionally misunderstood or forgotten over the course of some time — FCC stuff, studio building stuff, in-house stuff. It's worth a look or two in conjunction with the training manual and other documents on the website.

- Outside keybox: nobody but WOOL uses that keybox; we're responsible for consequences
 - know how to close it properly (don't jam it shut, it should close easily)
 - make sure it's closed, and spin the numbers every time
 - nobody under 18 can have the code
 - that's a 33 Bridge management rule, for liability reasons

- More 33 Bridge rules
 - lock the outside door after 5PM weekdays, and on weekends
 - unless there's a tenant in the building who wants the door open; check with them
 - you can leave the door locked during your after-hours or weekend show if you wish — or
 - you can leave it unlocked if you're going to keep an eye on it (it's your responsibility)
 - do you know how to use the hex key?
 - no unaccompanied minors anywhere in the building
 - no smoking anywhere in the building
 - respect other tenants and their guests

- we share responsibility for the bathroom — cleaned and stocked
 - honor system
- we share responsibility for the big room — cleaned and tidy
 - we track in snow and dirt, leaves blow in
- if you open windows in the studio, close them again
- we don't have the run of the building: stay out of areas we have no business being in

- WOOL studio door
 - don't share your code
 - nobody under 18 is to have a code
 - don't override the lock from the inside (it gets forgotten and the studio stays unlocked)

- Sign-in sheet
 - everyone must sign in (and out) at the studio every time
 - note: regular cohosts and permanent guests must also be current members, and must be certified hosts in good standing with all fees paid
 - visitor policy: "all visitors are subject to all WOOL policies and are the responsibility of the host who invites them; the host, by bringing a visitor into the station or allowing a visitor access to the studio, takes on the responsibility for any problems that may occur; visitors must sign in"

- Station log (that's the binder on the metal wire shelves)
 - required by federal law
 - use your full legal name, written legibly
 - use military time
 - a new sheet every day
 - check the appropriate box indicating our transmitter status
 - check the "on air" box unless the transmitter isn't transmitting

- the only time you check "off air" is if the transmitter isn't transmitting
- Notes posted at console area, white board, around the station, by email, etc
 - nobody is exempt — nobody
 - they're (almost always) in response to problems or issues that need to be addressed
 - equipment preservation / malfunction / disappearance
 - legal compliance
 - behaviors and actions that negatively affect other hosts
 - etc
- Trash and recycling
 - if you make it, you take it — all trash and recycling that you create goes home with you
 - there is no cleaning service to pick up after you
- Equipment malfunction / breakage must be reported
 - it's a matter of courtesy to your fellow hosts
 - it can prevent further damage
 - it won't get fixed if the fixer-person doesn't know about it
 - stick a note on it
 - and write it in the DJ book
 - and write in on the white board
 - and post it to the host email list
 - accidents happen; don't fear
 - however, "unauthorized use or intentional misuse of any property of WOOL will result in immediate disciplinary action, including but not limited to the immediate revocation of broadcasting privileges"

- PC3 (the computer by the console)
 - for station activities — not for surfing porn and stuff like that
 - don't change the settings, don't install anything
 - everybody must know how to manually trigger and log EAS tests / alerts
 - if an FCC field agent stops by, you will — guaranteed — be asked to run an EAS test; failure to know how is a fined offense
 - note: the host contract that you signed says "you agree to be responsible for all costs including but not limited to fines, penalties, legal fees, and court costs arising from my acts or omissions in violation of the rules and regulations"

- FCC agent visits
 - section 303(n) of the Communications Act gives the FCC the authority to inspect all "stations required to be licensed"
 - failure to allow inspection can result in license revocation and maximum fines
 - agents won't "come back later" — immediate on-the-spot inspections are required
 - if you're there when they come, you're the one who gets to answer their questions and represent the station
 - answer any questions truthfully and non-evasively
 - if you don't know the answer to a question, the correct response is "I don't know"...

 - HOWEVER:
 - it's essential that you know how to do an EAS test
 - it's essential that you know how to access the public file (that's coming up later)
 - the likelihood that we'll ever be inspected is small
 - but the consequential fines could destroy the station if we're not prepared

- Record players
 - As of this update, we have no functional record players due to the expense and discouragement of repeated premature failure of the needles — sometimes in a matter of days

- Headphones
 - the station will not be replacing its headphones anymore due to excessive premature failure by abuse
 - hosts may donate replacements if they wish

- CDs and any other station-owned items should never ever leave the building without board approval
 - if you've "borrowed" anything, bring it back and don't do it again
 - theft is grounds for termination of your show

- Facility care and respect for fellow hosts
 - put things back where they belong
 - reset equipment you've used
 - if you turned anything on, turn it back off
 - if you've opened windows, close them
 - straighten things up
 - any trash or recycling that you generate goes home with you
 - vacuum the floor if needed
 - etc
 - "alcohol and illegal substances are prohibited on station property (alcohol may be present at special events if sanctioned by the board of directors)"

- Legal ID
 - our legal ID is "WOOL-FM, 91.5, Bellows Falls"

- the legal ID is exactly that in precisely that order, don't add anything or change anything or leave anything out
 - points for style: our legal call letters are letters — “W-O-O-L” — and not the word “wool”
 - federal statute is clear: say the right thing, and say it within a couple minutes of either side of the top of every hour
 - this too is an offense they will issue fines for
 - it's good form to also remind the listeners three or four times during the hour that they're listening to Black Sheep Radio or WOOL, and your show name and who you are
- PSAs
 - you're required to read a minimum of two per hour
 - don't say things like "I have to read these PSAs" or "let's get these out of the way" — the PSAs are an important part of fulfilling our community service mission — belittling the PSAs belittles the station's value, the PSA subject, and even the listeners
 - PSAs can be read anytime during the hour, together or separately
 - there are a couple shows with hosts reading several PSAs per hour, and it works great — it sounds like a station that actually cares about and is serving the local community
- Program log
 - fill one out for every show where you play any music
 - include all songs, including bumpers and beds
- Issues log
 - all broadcast stations are legally required to include programming that meaningfully addresses significant issues of concern and importance to its community
 - failure to do this can result in fines of up to \$10,000 from the FCC, and result in revocation of the station's broadcast license

- PSAs do not fulfill this requirement
 - public service segments can include programming of any length, as long as it addresses substantively and seriously a significant issue facing the community
 - all hosts are encouraged to do at least one of these segments each month
 - we need to document these segments; there's a clipboard with forms in the console area
 - drop off completed forms on the admin desk on the other side of the room
 - the issues logs are added to the public file quarterly
- Public file
 - the public files for all broadcast stations are now online at the FCC website, maintained online by the individual stations, rather than paper files kept in the main studio
 - this is another thing that one or more WOOL volunteers are doing on your behalf so that the station continues to exist
 - take a moment to think about all the things that need to happen for an organization like WOOL to exist — paperwork, filing stuff with the government, paying bills, fundraising, dealing with the mail, processing memberships, maintaining automation, answering emails, checking phone messages, and on and on — all done by your fellow volunteers
 - please help
 - even though it's online, our Public File must be "available for public inspection" at our studio — there is a link to it at the bottom of our website's home page at www.wool.fm
 - if anybody shows up and asks to look at the public file, set them up on PC3 or the admin computer with a smile
 - don't delay, even if it's during your show
 - don't ask who they are
 - don't ask why they want to see it

- if this person happens to be an FCC field agent and you don't give them access to the online public file, a fine will be issued
 - again note: the host contract that you signed says "you agree to be responsible for all costs including but not limited to fines, penalties, legal fees, and court costs arising from my acts or omissions in violation of the rules and regulations"
 - as required by federal statute, our public file contains:
 - FCC authorizations / licenses / permits
 - FCC applications and supporting documents / exhibits
 - Contour maps showing our broadcast footprint
 - Ownership reports
 - Political file (WOOL doesn't accept paid political content, and has an in-house policy on political campaign content [see which])
 - The Public and Broadcasting booklet
 - Issues / Programs lists of programming that "aired during the preceding quarter that provided the stations' most significant treatment of community issues"
 - Local public notice certifications and announcements for license renewal
 - Material relating to FCC investigations and complaints
- Business hours
 - until recently, it was a condition of keeping our broadcast license to maintain posted business hours showing when the station is staffed; this law has been relaxed
 - however, all WOOL hosts and volunteers are still considered staff and must reasonably accommodate the public and comply with FCC field agents
 - just like having a show is a privilege and a commitment that comes with responsibilities, having a radio station is a privilege and commitment that comes with responsibilities
- Missing your show

- if you can't do your show some week, it's your responsibility to post to the WOOLhost email list with as much lead time as possible
 - other hosts can fill in for missing hosts if they wish
 - the substitute can fill in with content of their choosing
 - it's better to have somebody doing a live show when listeners are expecting a live show even if it's not who or what they expected
- it can be hard to tell and surprising to learn, but your show has regular listeners whether you know it or not
 - when you blow off your show, you're blowing off your listeners and before long you'll lose them; if you're not loyal to them, they won't be loyal to you
- it's understood that sometimes things happen at the last minute; we all do our best, that's all we can do
- if you miss three shows in a row without posting your absence to the WOOLhost email group, you'll forfeit your place on the schedule
 - it's always been the rule that that permission for a long interruption in your show is needed from the programming coordinator or board of directors, or you'll forfeit your place on the schedule
- Since we've been mentioning FCC fines, here are some of the things the FCC can issue fines for, and the base amount of each fine (per incident! — there can be multiple fines for repeated offenses)
 - violation of public file rules: \$10,000 (your issues-programs logs are IMPORTANT)
 - violation of political rules: \$9,000
 - false distress communications: \$8,000 (don't misuse the EAS, don't joke about the station being held hostage)
 - violation of broadcast hoax rule: \$7,000 (don't try to convince people that it's the zombie apocalypse or that microsoft is giving away computers)
 - EAS equipment not installed or operational: \$8,000
 - failure to permit inspection: \$7,000 (when an FCC field agent knocks, let them in)

- transmission of indecent / obscene materials: \$7,000 (even in song lyrics, and that includes non-English lyrics)
 - no explicitly sexual stuff, even in "clean" language
 - no "scatalogical" talk about poop and pooping
 - the general rule: if there's any question at all, don't air it
- fraud by wire, radio or television: \$5,000
- failure to respond to Commission communications: \$4,000
- broadcasting telephone conversations without authorization: \$4,000 (always ask for a person's consent before putting them on the air)
 - no prank calls
- violation of sponsorship ID requirements: \$4,000
- violation of requirements pertaining to broadcasting of lotteries or contests: \$4,000
- failure to file required forms or information: \$3,000
- failure to provide station ID: \$1,000
- failure to maintain required records: \$1,000
- Fine amounts can be increased in cases of:
 - egregious misconduct
 - intentional violations
 - prior violations of any FCC requirements
 - repeated or continuous violations
- Fine amounts can be decrease in cases of:
 - good faith or voluntary disclosure
 - a history of overall compliance
- it behooves us to always follow the rules as much and as closely as possible