Memorandum to Presidents

Date: January 23, 1985
From: Office of the Chancellor
Subject: Reissue of Guidelines for Establishment and Operation of Noncommercial Broadcast Radio Stations
To: Presidents, State University of New York

The attached guidelines for the establishment and operation of noncommercial broadcast radio stations at State-operated campuses (Memorandum to Presidents, Vol. 73, No. 54) are being reissued due to the amount of time that has passed since their initial development and issuance in 1973. No changes have been made in the guidelines. These guidelines were developed with the aid of the Council of Presidents in accordance with the policy criteria adopted by the Board of Trustees in Resolution 73-5.

As you will note, the guidelines reflect the importance of the responsibility assumed by the University under a license issued by the Federal Communications Commission and the valuable contribution to the educational program of a campus which may be derived from a broadcast facility. Should you have questions concerning the guidelines or the processes involved in the establishment and operation of a broadcast station on your campus, please contact Sanford Levine or Sherry H. Penney.

Clifton R. Wharton, Jr.

Attachment

This memorandum addressed to:

Presidents, State-operated Campuses
Deans, Statutory Colleges

Copies for information only sent to:

Presidents, Community Colleges
President Coll
Vice Provost Spencer
Memorandum to Presidents

Date: October 15, 1973

From: Office of the Chancellor

Subject: Guidelines for Establishment and Operation of Noncommercial Broadcast Radio Stations

I'm pleased to transmit to you the attached guidelines for the establishment and operation of noncommercial broadcast radio stations at the State-operated campuses. Working with the Council of Presidents, we developed these guidelines in accordance with the policy criteria adopted by the Board of Trustees in Resolution 73-5.

As you'll note, the guidelines reflect the importance of the responsibility assumed by the University under a license issued by the Federal Communications Commission and the valuable contribution to the educational program of a campus which may be derived from a broadcast facility.

I'm asking Jim Smoot to coordinate communications between the campuses and appropriate members of the central staff who may assist you. Should you have questions concerning the guidelines or the processes involved in the establishment of a broadcast station on your campus, please let him know.

Ernest L. Boyer

Attachment

This memorandum addressed to:
Presidents, State-operated campuses

Copies for information only sent to:
Presidents, Community Colleges
Chancellor Kibbee
Dean McGrath
Resolution 73-5 adopted by the Board of Trustees on January 24, 1973

Resolved that the Chancellor be, and hereby is, authorized to develop and issue guidelines for the establishment and operation of noncommercial broadcast radio stations at the State-operated campuses of the University, in accordance with the following policy criteria:

1. Licenses for all broadcast stations shall be applied for and held in the name of the University, as further authorized by this Board, in accordance with the rules and regulations of the Federal Communications Commission;

2. The establishment of such broadcast stations shall be consistent with the educational missions of the campuses and overall University and State policy on telecommunications development; and

3. The operational requirements for such stations shall include adequate provision for their effective management and necessary budgetary support.

(73-5)
STATE UNIVERSITY OF NEW YORK

GUIDELINES FOR THE ESTABLISHMENT

OF A

NONCOMMERCIAL BROADCAST RADIO STATION

October 1973
GUIDELINES FOR THE ESTABLISHMENT
OF A NONCOMMERCIAL BROADCAST RADIO STATION

I. Application for a License

The campus President, upon determination that the establishment of a noncommercial broadcast radio station is consistent with and will contribute to the educational mission of the campus, should submit a written proposal and completed Federal Communications Commission (FCC) application for construction permit (except sections 1 and 2) to the Chancellor. The written proposal shall describe in detail how the station will meet these guidelines and the legal requirement that such a station shall serve "the public interest, convenience and necessity." Upon completion of appropriate review and consultation with the campus by members of the Chancellor's staff, the proposal will be submitted to the Chancellor for approval. The Chancellor will present approved proposals to the Board of Trustees for their consideration.

II. Purpose of the Station

The purpose of the station shall be clearly consistent with and contributory to the educational mission of the campus. It should make a specific contribution to the educational experience of students and to the community which it is designed to reach. The station should have clearly defined relationships to the academic
program, the activities program, community media resources, and other campus communications programs.

III. Programming

The programming will be designed to meet the defined purpose of the station, the needs of the anticipated audience, and shall meet FCC requirements for public service. A process shall be developed for periodic review of the appropriateness of programming and procedures established to assure that programming is consistent with the stated purpose of the station.

IV. Physical Facilities and Equipment

Adequate physical facilities must be committed to provide for studios, control rooms and storage to meet the stated purpose of the station. Equipment and installation shall be of the quality and condition to assure compliance with FCC regulations. All equipment, including antennas, will be located on University property unless specifically otherwise authorized upon proper justification. Power of the station should be consistent with the stated purpose of the station and the anticipated audience which has been defined.

V. Engineering Requirements

An engineering study shall be prepared and included in each proposal for new or modified station license. The study must include two parts which take
into consideration (a) an allocations study to establish the availability of the FM radio channel specified, and (b) an analysis of the probability of radio frequency interference on the part of the proposed facility with other users of the radio spectrum. Specific considerations which must be included in the engineering study are detailed in Attachment A.

Provision shall be made for the employment or retention of a Chief Engineer who shall be responsible for compliance of station studio and transmission equipment with FCC requirements as applicable to Educational FM broadcasting for the category of service proposed. The engineer shall possess a First Class Radiotelephone FCC license.

VI. Financing

Budgetary support of the station must be adequate to meet the stated purpose, programming commitments, and engineering requirements to conform to FCC regulations. Insofar as possible, provision should be made for assurance of continued financial support at an adequate level.

VII. Station Management

Continuity in operation of a noncommercial radio broadcast station is essential to meeting the purpose of the station, and the management structure shall be designed
to meet this requirement. Station management organization should be adequate to meet programming commitments.

VIII. **Supervision of Station Operation and Compliance with FCC Regulations**

The President of each campus at which a non-commercial broadcast station is established is responsible for the compliance of the station with all applicable statutes, rules and FCC policies. The President shall determine the appropriate administrative and operational relationships necessary to assure compliance. Such relationships should provide for any necessary review of operations which may be necessary to meet the nondelegable responsibility of the University as licensee for proper and sufficient control over programming with particular reference to the policies and requirements governing such programming (e.g., obscenity, personal attacks, the fairness doctrine, lottery information, fraudulent schemes, equal opportunities for political candidates, the licensee's limitations on identification of programs produced by, or at the expense of, or furnished by others).

IX. **Interconnection of Closed-Circuit Carrier Current Operations with Private Cable Systems**

The appropriate provisions of these guidelines shall also apply in any case in which interconnection to a community cable system (CATV) is proposed for a
student or State-supported closed-circuit carrier current operation. In such a case the campus President shall make similar determinations and assume similar responsibilities in the approval and implementation of such a proposal as he would in the case of a broadcast license.
Resolution 73-5 adopted by the
Board of Trustees on
January 24, 1973

Resolved that the Chancellor be, and hereby is, authorized to develop and issue guidelines for the establishment and operation of noncommercial broadcast radio stations at the State-operated campuses of the University, in accordance with the following policy criteria:

1. Licenses for all broadcast stations shall be applied for and held in the name of the University, as further authorized by this Board, in accordance with the rules and regulations of the Federal Communications Commission;

2. The establishment of such broadcast stations shall be consistent with the educational missions of the campuses and overall University and State policy on telecommunications development; and

3. The operational requirements for such stations shall include adequate provision for their effective management and necessary budgetary support.

(73-5)
ATTACHMENT A

1. The Allocation Study must include all pertinent data to establish the rationale for availability of the channel as related to the proposed antenna height, effective radiated power, the second harmonic relationship to TV channels 7 or 8 visual and aural carriers if they are received off-air in the community, and as related to the radiation contours of other FM broadcast facilities as cited in the applicable FCC regulations.

2. **Radio Frequency Interference**: probability shall be predicted upon potential interference as follows:
   
   a. Second harmonic interference to television channels 7 and 8. Severity of possible interference is dependent upon the relative strengths of the TV carriers and residual second harmonic content of the radiated FM signals, and upon the numerical proximity of the harmonic FM signal carrier to the sound and picture carriers of the TV channel.

   b. Cross-modulation interference to any television channel, particularly to channel 6.

   c. Crossover into TV distribution or other wired systems on campus.
Interference potential is influenced by the proximity of the FM transmitting antenna to local receiving antennas, by antenna height, effective radiated power, harmonic content; and by the presence of effected desired signals, however weak, which have been found useful in the community by individuals and/or by community antenna systems (CATV).

Radio frequency interference can be minimized through: selection of an FM channel which does not bear a second harmonic passband relationship to TV channels 7 or 8 if either or both are received in the community; through selection of a transmitting antenna site somewhat removed from a CATV system or campus TV distribution system antenna site, and also somewhat removed from clusters of roof-top home TV antennas. This is particularly critical in areas having reception of channel 6 TV signals.

The Engineering Report shall take into account the relationship cited herein and shall document the locations of and distances between the proposed FM transmitting antenna and the receiving antennas of the local CATV system and the campus TV distribution system. The geographic relationship between the transmitting antennas and home TV receiver antennas within one half mile shall be approximated.

In addition, a list of all VHF TV channels regularly received off the air in the community environs by CATV and home antenna installation, and the relative signal
strength of each picture carrier, expressed in dbj units, shall be provided. Measurement shall include the gain of the receiving antenna utilized in conjunction with the field strength meter.