

RADIO ADMINISTRATION
FCC REGULATORY INFORMATION
GENERAL

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System interstate and radio operations. Sources of additional information for in-depth study, current developments, and Bell System administrative procedures are provided in the appendices to assist the interested reader according to his needs.

Reason for Reissue

1.02 This Practice is reissued as a result of organizational and procedural changes by the Federal Communications Commission.

Policy

1.03 It is the policy of the Bell System to fully comply with the Communications Act of 1934, as amended, and all applicable Rules and Regulations of the FCC. To implement this policy, all responsible personnel must have a knowledge of the particular regulations affecting the service involved and an appreciation for the background and authority on which they are based.

Scope

1.04 This Practice discusses the origin, jurisdiction, organization, activities, and administration of the FCC. Emphasis centers on the regulation of interstate facility construction and radio services as it relates to the Bell System. Specific day-to-day administrative procedures and interpretation of the Act and the Rules may be found in other Practices (see Appendix 1).

1. INTRODUCTION

Purpose

1.01 Interstate and foreign communication service provided by the Bell System companies by physical and radio transmission media is regulated by the Federal Communications Commission (FCC) in accordance with the Communications Act of 1934, as amended. This Practice provides an introduction to this law and the Rules and Regulations (Rules) established by the FCC which govern the Bell

2. EARLY FEDERAL REGULATION

The Post Roads Act of 1866

2.01 Governmental interest and regulation of interstate communication and radio has a long history. A Congressional appropriation in 1843 financed construction of an experimental

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telegraph line from Washington, D.C., to Baltimore, Maryland. The Post Roads Act of 1866 stimulated railroad and telegraph expansion to aid development of the West and was the beginning of federal regulation of interstate electrical communication.

Consolidation of Authority

2.02 Communication by telegraph grew, and telephone and radio were introduced and expanded. A succession of laws and federal agencies regulated the growing communications industry until it became desirable to consolidate this authority in a single agency with broad responsibility over interstate and radio communications. This was accomplished by the enactment of the Communications Act of 1934. (See Appendix 2 for additional history of communication regulation.)

3. THE COMMUNICATIONS ACT OF 1934

3.01 The Communications Act of 1934 was approved June 19, 1934, as Public Law No. 416 of the Seventy-Third Congress, with an effective date of July 1, 1934. This law has been amended numerous times since its enactment and is known officially as the Communications Act of 1934, as amended. In subsequent parts of this Practice and by common usage, it is often referred to simply as the Act.

Purpose

3.02 The Communications Act of 1934 created the Federal Communications Commission to:

- (a) **Regulate** interstate and foreign communications by wire and radio.
- (b) **Make** a rapid, efficient, nationwide, and worldwide wire and radio **communication** service **available** to the people of the United States.
- (c) **Establish** reasonable **charges** for communication service.
- (d) Make communications available for the purpose of the **national defense**.
- (e) **Promote safety** of life and property through the use of wire and radio communication. (This provision was added in 1937.)

(f) **Centralize** and grant additional **authority** over interstate and foreign communications to one agency.

(g) **Execute** and enforce the Act.

Structure of the Act

3.03 The Act is divided into the following six major parts, called "Titles":

- (a) Title I—General Provisions
- (b) Title II—Common Carriers
- (c) Title III—Provisions Relating to Radio
- (d) Title IV—Procedural and Administrative Provisions
- (e) Title V—Penal Provisions—Forfeitures
- (f) Title VI—Miscellaneous Provisions.

Each title is composed of various "Sections," which are numbered to reflect the Title of which they are a part; i.e., Section 214 is under Title II, Section 319 is part of Title III, etc. Where appropriate throughout this Practice, reference will be made to various Sections of the Act to facilitate further research in a particular subject area. Although they are not part of the Act, several appendices are published with it because of the general applicability.

An Outline of the Act

3.04 Each Section of the Act will not be discussed in this Practice. However, an appreciation for the scope of the Act may be obtained by referring to the topical outline of the Act in Appendix 3.

Jurisdiction

3.05 The provisions of the Act apply to all persons engaged in interstate communication in the United States and its possessions and territories. Exceptions to this include:

- (a) Persons in the Canal Zone (Sect. 2)
- (b) Any carrier providing interstate service solely through physical or radio connection with

another nonaffiliated carrier (Sect. 2). Such a carrier does not have interstate plant and is commonly called a "connecting carrier" not subject to the Act (Sect. 3)

- (c) Matters subject to regulation by a state commission or local government authority (Sect. 221)
- (d) Radio stations owned and operated by the U.S. Government (Sect. 305).

The terms "carrier" and "common carrier" are synonymous and mean any person offering interstate communication service for hire, excepting connecting carriers and radio broadcasting (Sect. 3). The "person" frequently mentioned in the Act includes individuals and corporations among others (Sect. 3).

3.06 Title II—Common Carriers is of particular interest. Under its provisions, the FCC has broad powers over such areas as:

- (a) Service and charges (Sect. 201)
- (b) Division of charges (Sect. 201)
- (c) Tariff changes (Sect. 203)
- (d) Public complaints (Sect. 208)
- (e) Valuation of property (Sect. 213)
- (f) Construction or extension of lines (Sect. 214)
- (g) The discontinuance, reduction, or impairment of service to a community (Sect. 214)
- (h) Annual reports and other records (Sect. 219)

Note: Over 2600 different reports are provided by the system yearly, most of which become a matter of public record (Sect. 412).

- (i) Accounts, records, and depreciation charges (Sect. 220)
- (j) Proposed acquisitions, consolidations, or changes in control of telephone companies (Sect. 221).

Radio Regulation

3.07 Under Title III—Provisions Relating to Radio, the FCC has authority over non-government radio channel usage, but not radio station ownership (Sect. 301). A license must be obtained in order to operate a radio station, and this authority is granted for limited periods of time (Sect. 301). License renewal may be granted by the Commission upon proper application by the licensee (Sect. 308).

Spectrum Management

3.08 In order to carry out its assigned responsibility to manage the radio frequency spectrum in the public interest, Congress gave the FCC power to:

- (a) Classify and prescribe the nature of service to be rendered by each station (Sect. 303).
- (b) Assign bands of frequencies to various classes of stations, and assign specific frequencies to individual stations (Sect. 303).
- (c) Regulate the type of equipment to be used (Sect. 303).
- (d) Study new uses for radio (Sect. 303).
- (e) Require that station records be kept (Sect. 303).
- (f) Prescribe the qualifications for station operators (Sect. 303).
- (g) Suspend the license of an operator for just cause (Sect. 303).
- (h) Inspect radio installations to ascertain whether the construction and operation conform to all requirements (Sect. 303).
- (i) Designate and publish station call letters (Sect. 303).
- (j) Require painting and/or illumination of radio towers (Sect. 303).

Note: The Federal Aviation Agency (FAA) is responsible for air safety, but the FCC has authority to specify obstruction marking for radio towers.

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- (k) Make rules to prevent interference between stations (Sect. 303).
- (l) Determine the citizenship, character, financial, technical, and other qualifications of an applicant to operate a radio station (Sect. 308, 310).
- (m) Require the minimum amount of power necessary for a radio station to provide the desired communication (Sect. 324).

Licensing Procedure

3.09 Licensing procedures differ somewhat for the various radio services, but typically include the following:

- (a) **Application:** The applicant submits the proper written application to the FCC (Sect. 308). Standard forms are available for this purpose.
- (b) **Public Notice:** The FCC places the application on a Public Notice to advise others of the proposal. Under normal conditions, the Commission cannot grant (approve) an application until 30 days after the Public Notice is issued (Sect. 309).
- (c) **Construction Permit:** If there are no objections to the applicant's proposed radio usage and the FCC finds it to be in the public interest, convenience, and necessity, a construction permit will be issued (Sect. 309).
 - (1) No license can be issued unless a construction permit has been granted by the Commission except for Government, amateur, and mobile stations (Sect. 319). In some services, such as Maritime and Telephone Maintenance, a combined construction permit and license authorization is issued to an applicant.
 - (2) A construction permit will specify the earliest and latest dates between which construction and operation of a station may begin. Failure to complete the job within the allowed time will result in forfeiture of the authority unless an extension of time is allowed by the Commission (Sect. 319).
- (d) **License Application:** Upon completion of authorized construction, an application

for a radio station license is submitted to the Commission. If the Commission finds the requirements have been met, a radio station license is issued (Sect. 319).

- (1) In those cases in which a license is issued initially in lieu of a construction permit, e.g., the Maritime and Telephone Maintenance Radio Services, the station must be placed in service within 8 months of the issue date or the authorization is invalid.

The above is but a skeletal description of the licensing procedure, as there are numerous other procedures and requirements that must be met. However, it serves to illustrate that the Act is specific in the procedural requirements necessary to obtain FCC authorization to operate a radio station.

Public Interest

3.10 Since the Commission must determine whether a proposed radio station will serve the public interest, convenience, and necessity before granting an application, it is of the utmost importance that sufficient justification be provided for the Commission's consideration (Sect. 309 and 319).

Petitions to Deny

3.11 To aid the Commission in determining the public interest to be served by the grant of authority for a given station, the Act provides that any "party in interest" may file a petition to deny an application at any time prior to the day of approval or such other shorter period as the Commission may specify (Sect. 309). The petitioner is required to provide a copy of the petition to the applicant so that a reply may be made to the allegations. After considering a petition to deny and the reply comments, the Commission may, depending on its findings:

- (a) Grant the application and deny the petition, giving the reasons for the action (Sect. 309).
- (b) Designate the application for hearing to resolve the issue (Sect. 309).

Hearings

3.12 A case may be set for hearing by the Commission or by a member of the Commission's

staff acting under delegated authority. Designation is usually by a Memorandum Opinion and Order specifying the reasons for the hearing and the issues to be considered. The Chief Administrative Law Judge appoints an Administrative Law Judge to preside over a hearing and specifies dates for the opening prehearing conference and hearing. At the prehearing, the parties work out a schedule of procedural dates, coordinate the exchange of written exhibits, and interpret the issues—all toward the end of shortening the hearing and limiting testimony to essentials. The hearing usually follows conventional courtroom procedures. Witnesses testify under oath, often submit supplementary written exhibits, and may be cross-examined. When the hearing is concluded and the record closed, the parties may submit their proposed findings of fact and conclusions, which are their summations of the case and briefs on legal points. At the discretion of the Administrative Law Judge, they may be permitted to file replies to their opponent's proposed findings of fact and conclusion. The Administrative Law Judge may issue an Initial Decision. This is an exposition and analysis of the facts and a reasoned explanation of conclusions, together with the decision. The Commission may then issue an order confirming or revising the initial decision.

The Review Board and Appeals

3.13 If a party takes exception to an initial decision or to a ruling of the judge during the hearing, an appeal may be made to the Review Board. This Board also acts on petitions to modify or enlarge the scope of the hearing issues. A party dissatisfied with a Review Board decision may appeal to the Commission. If the Commission denies the appeal, the action marks the end of the Commission's hearing process, except for possible reconsideration. For any further action, the party must appeal to the courts.

Revocation

3.14 Elaborate procedures to insure efficient usage of the radio spectrum would be of little avail if, after receiving authorization, a licensee failed to operate in compliance with the Act and the terms of the license. Accordingly, the Act invests the FCC with authority to revoke any station license or construction permit because of:

(a) False statements, knowingly made

- (b) Knowledge of conditions coming to its attention which warrant revocation
- (c) Willful or repeated failure to operate according to the terms of a license
- (d) Failure to observe Commission directives (Sect. 312).

Of course, the licensee is given an opportunity to show cause why a license or construction permit should not be revoked (Sect. 312).

Forfeitures

3.15 In addition to revocation, other penal provisions for non-compliance with the Act are available to the Commission. Upon due conviction of an offense for which no penalty is provided by the Act, a fine or imprisonment or both may be imposed (Sect. 501). Upon conviction for violations of conditions imposed by the Commission under the authority of the Act, a fine for each day the offense occurs may be levied in addition to other penalties (Sect. 502).

Importance of Application Accuracy

3.16 From the foregoing, an application for a Radio Station Authorization may be seen as transferring radio engineering data to the legal and public arena because an application filed with the FCC is a legal document. When viewed in this light, it is impossible to overemphasize the importance of presenting a carefully prepared application for the Commission's consideration.

4. THE RULES AND REGULATIONS

4.01 The Communications Act of 1934, as amended, provided the Federal Communications Commission with the power to make Rules and Regulations and issue such orders as necessary to carry out its mandated functions (Sect. 4, 201, 303). Under this authority, the FCC has issued a series of Rules and Regulations (Rules) relative to its own organization and the specific areas or services it regulates. The Rules and Regulations are designed to enable the Commission to carry out the Act and have the same power as the Act. Frequently the wording of the Rules parallels that of the Act.

Volumes and Parts

4.02 The Rules and Regulations are published in ten pamphlet-size volumes, which may be obtained from the Superintendent of Documents (see Appendix 4). Each volume contains several "Parts" which are given numerical identification. For example, the following are some of the Parts frequently referred to by engineering groups:

- (a) Part 17—Construction, Marking, and Lighting of Antenna Structures
- (b) Part 21—Domestic Public Radio Services
- (c) Part 25—Satellite Communications
- (d) Part 63—Extension of Lines and Discontinuance of Service by Carriers
- (e) Part 64—Miscellaneous Rules Relating to Common Carriers
- (f) Part 81—Stations on Land in the Maritime Services
- (g) Part 91—Industrial Radio Services.

A list of the ten volumes of FCC Rules and Regulations and the component Parts may be found in Appendix 5 of this Practice.

Applications to the FCC

4.03 Most applications to the FCC should be prepared and presented in accordance with the requirements and instructions contained in the applicable Part(s) of the Rules. The Rules are the prime source of information on the regulatory requirements for a particular service or operational procedure. Clarification of the Rules regarding the procedures and system instructions relevant to preparing FCC applications can be found in the Bell System Practices listed in Appendix 1.

5. ORGANIZATION OF THE FCC

Commissioners

5.01 The Federal Communications Commission is directed by seven Commissioners:

- (a) Appointed by the President and subject to Senate confirmation

- (b) With staggered 7-year terms, so that one term expires each year. Vacancies occurring during a term are filled for the remainder of that term. Commissioners may be reappointed
- (c) With no more than four permitted from the same political party
- (d) Who hold weekly agenda meetings, executive sessions, and special meetings to carry out their regulatory functions. The Commission may also act between meetings "by circulation," a process whereby a document is submitted to the Commissioners individually for consideration
- (e) Who must make an annual report to Congress
- (f) Who normally meet in the District of Columbia, but may convene elsewhere
- (g) One or more of whom may be designated to preside in a hearing proceeding or be assigned special duties.

A vacancy on the Commission does not impair the remaining Commissioners from exercising all the powers of the Commission (Sect. 4).

The Chairman

5.02 One of the Commissioners is designated by the President as the Chairman and serves at the pleasure of the President (Sect. 5). The Chairman:

- (a) Is responsible for general administration and internal affairs of the Commission
- (b) Presides over all meetings of the Commission
- (c) Represents the Commission in legislative matters and communications with other Government departments and agencies
- (d) Must keep the Commission advised concerning actions taken under his authority.

If the Chairman is absent or unable to serve, the Commission may designate one of its members as Acting Chairman.

Board of Commissioners

5.03 A majority, normally four, of the Commission members constitutes a quorum. Whenever a quorum is not present, the Chairman or Acting Chairman may convene a Board of Commissioners composed of all Commissioners present and able to act. The Board of Commissioners:

- (a) Has most of the powers of the full Commission
- (b) May act on matters normally assigned to an individual Commissioner or a committee of the Commission (1) if the individual or his alternate is not present or able to act or (2) in the absence of a quorum of the committee
- (c) Must convene at the Commission's Washington, D.C., office.

Standing Committees

5.04 There are two standing committees:

- (a) Subscription Television Committee
- (b) Telecommunications Committee.

Each committee is composed of three Commissioners delegated to act or study and report on matters in their designated area of interest. The Telecommunications Committee acts on applications and requests of telephone common carriers submitted under:

- (1) Section 214 (extension of lines) of the Act
- (2) Section 319 (radio construction permits) of the Act.

In practice, the authority of the Telecommunications Committee is delegated to the Common Carrier Bureau for projects costing under \$10,000,000 unless a major policy matter is involved.

Delegation of Authority

5.05 The work of the Commission is obviously too much for seven persons. To meet the challenge of administering the Act, the FCC is empowered to delegate its functions to any employee or staff organization. Any action taken as a result of delegated authority has the same effect as if

performed by the Commission but is subject to review by the Commission (Sect. 5).

The FCC Staff

5.06 The authority delegated by the Commissioners is exercised by an organization which is structured along functional lines of responsibility. Figure 1, an organization chart of the FCC, shows that each office, board, or bureau is directly responsible to the Commission. Typically, an office or *bureau* is further subdivided into operational *divisions*, which in turn may be composed of specialty *branches*, each of which is headed by a chief. In addition to its permanent organization, special committees and task forces may be formed to investigate and advise the Commission in specific areas of interest.

Staff Size and Budget

5.07 In July of 1934, 233 personnel were transferred to the FCC from the defunct Radio Commission (Act of 1927). A year later the staff numbered 442 with a budget of \$1,146,885. The 1972 staff averaged about 1600 employees with a budget of approximately \$30,000,000. Commission budgets are subject to Congressional approval. In accord with Congressional mandate, the FCC first established a fee schedule for its services in 1964 to make its activities as nearly self-sustaining as possible. The fee schedule is adjusted periodically as budget requirements change. All monies received by the FCC are paid into the U.S. Treasury.

Staff Functions

5.08 An abridged description of the FCC staff's functions and responsibilities follows:

Office of Executive Director

- (a) Coordinates all staff activity
- (b) Internal administrative matters, personnel, budget planning, Public Information Act of 1966
- (c) Defense activities coordinator
- (d) Filing fee interpretations.

Office of the Chief Engineer

- (a) Engineering advisor
- (b) Representative on interagency frequency management and international communication activities
- (c) Long-range communication planning and spectrum management
- (d) Technical studies and standards
- (e) Laboratory and type approval and acceptance for equipment
- (f) Licenses experimental stations.

Office of General Counsel

- (a) Legal advisor
- (b) Representative in litigation
- (c) Institutes enforcement proceedings
- (d) Coordinates legislative matters and international agreements
- (e) Reviews national security aspects of certain applications.

Office of Administrative Law Judges

- (a) Conducts hearings
- (b) Prepares and issues initial decisions.

Review Board

- (a) Reviews initial hearing decisions
- (b) Certifies records to the Commission for initial or final decisions
- (c) Interlocutory requests.

Office of Opinions and Review

- (a) Assists and advises Commission in preparation of memorandums, opinions, decisions, and orders.

Broadcast Bureau

- (a) Licenses and regulates radio and television broadcast stations.

Cable Television Bureau

- (a) CATV regulation.

Common Carrier Bureau

- (a) Interstate and foreign communications by wire and radio
- (b) Common carrier regulation
- (c) Use of space satellites for other than common carrier communications purposes.

Safety and Special Radio Services Bureau

- (a) Non-common carrier radio, i.e., aviation, marine, police, fire, forestry, highway, business, taxi, motion picture, telephone maintenance, etc.

Field Operations Bureau

- (a) Detects violations of radio regulations
- (b) Monitors and inspects stations
- (c) Investigates interference complaints
- (d) Issues violation notices
- (e) Examines and licenses radio operators
- (f) Painting, lighting, and placement of antenna towers
- (g) Provides emergency direction-finding aid.

Executive Advisory Council

- (a) Composed of principal staff heads
- (b) Information interchange forum
- (c) Action recommendations to Commission.

Two public contact offices are of interest. The Secretary of the Commission and the Public Information Officer are under the Office of Executive Director.

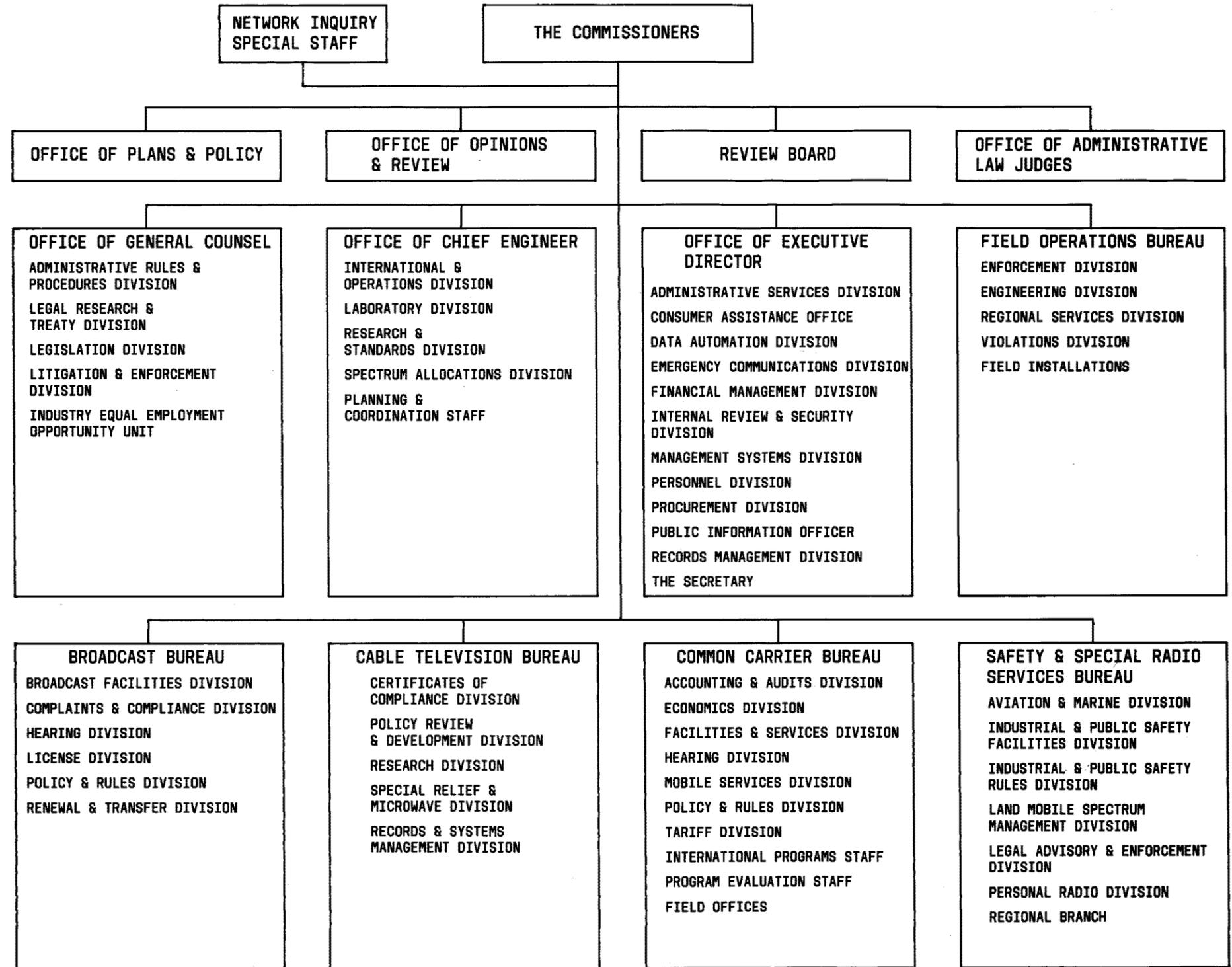


Fig. 1—FCC Organization Chart

The Secretary

- (a) Maintains records of official actions
- (b) Signs most documents and correspondence, including orders, permits, and licenses
- (c) Receives applications filed
- (d) Custodian of Commission's seal and records
- (e) Maintains record of hearings and rulemaking proceedings, legislative history, and reference library
- (f) Responsible for publication of documents in the Federal Register and FCC Reports and for printing the Rules.

The Public Information Officer

- (a) Contact point for the press, industry, and public
- (b) Distributes information of Commission action
- (c) Issues daily news releases and Public Notices
- (d) Prepares annual report, pamphlets, and booklets
- (e) Provides mail and in-person information service
- (f) Organizes exhibits and displays
- (g) Central source of public information.

The Common Carrier Bureau

5.09 Authority to regulate certain aspects of the rates, accounting, services, and interstate wire, cable, radio, and space satellite facilities of common carriers has been delegated to the Common Carrier Bureau. In other aspects, authority is retained by the Commission.

Common Carrier Bureau Organization and Functions

5.10 Figure 2 shows the Common Carrier Bureau organization. Seven divisions report to the Chief of the Common Carrier Bureau, and most of the divisions have branch units which report to

a division chief. Each branch in turn is headed by a chief. The various divisions interact and support one another with their particular expertise. A simplified description of some of the functions and areas of responsibility of the division branches follows:

I. FACILITIES AND SERVICES DIVISION**(a) *Domestic Branch***

- (1) Processes applications for point-to-point microwave, local television, developmental radio stations, Multipoint Distribution Service, registration
- (2) Section 214 authority to extend or supplement facilities or to discontinue, reduce, or impair service
- (3) Analyzes public need section of microwave radio applications
- (4) Studies of overall cost, quality, and adequacy of services and facilities
- (5) Studies use of services and facilities for national defense purposes
- (6) Customer complaints regarding facilities.

(b) *International and Satellite Branch*

- (1) International Service rates
- (2) Rules for international carriers
- (3) Technical rules for global satellites
- (4) Submarine cable landing licenses
- (5) Interlocking directorates of international carriers.

II. MOBILE SERVICES DIVISION

Processes applications for Rural and Domestic Public Land Mobile (air-ground, one-way signaling, two-way mobile, and developmental) Radio Services

(a) *License Branch*

- (1) Examines and records all applications received in the Mobile Services Division

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- (2) Processes or refers applications to bureau staff
- (3) Issues notifications concerning applications and prepares authorizations for all approved applications.

(b) Rules and Legal Branch

- (1) Reviews applications from a rules and legal standpoint
- (2) Reviews petitioned applications.

III. TARIFF DIVISION

(a) Tariff Review Branch

- (1) Reviews company's earnings
- (2) Plant separations
- (3) Division of revenue.

(b) Tariff Proceedings Branch

- (1) Settlements with independent companies
- (2) Interstate tariffs.

(c) Complaints and Service Standards Branch

- (1) Provides division and bureau legal assistance
- (2) Customer complaints (nonfacility).

IV. POLICY AND RULES DIVISION

V. HEARING DIVISION

VI. ECONOMICS DIVISION

(a) Economics Studies Branch

- (1) Cost studies.

(b) Cost Analysis Branch

(c) Depreciation Rates Branch

VII. ACCOUNTING AND AUDITS DIVISION

(a) Accounting Branch

- (1) Uniform system of accounts

- (2) Preservation of records.

(b) Audits Branch

- (1) Data processing of equipment inventory.

6. BELL SYSTEM REGULATORY RESPONSIBILITY

6.01 At the beginning of this Practice, it was noted that persons responsible for implementing the Bell System's policy of fully complying with the Act and the Rules must have a thorough knowledge of the regulations affecting their area of responsibility, plus an appreciation for its background and the authority under which they operate. This is a formidable challenge since the jurisdiction of the Commission over common carrier radio and interstate operations is as vast as it is complete. The importance of each member of the Bell System concerned with radio and interstate communications executing his responsibility under the law cannot be overstated. Although the Bell System is organizationally and geographically diverse, a unified approach and understanding in regulatory proceedings before the FCC is essential.

The Associated Companies and AT&T

6.02 The associated companies of the Bell System and AT&T are responsible for complying with the Communications Act of 1934, as amended, and the Rules and Regulations of the FCC. To assist the companies, the organization of the Vice President, Federal Relations (AT&T Regulatory), has been assigned the responsibility for all Bell System matters before the FCC. This department acts as a clearinghouse for the FCC and its staff to avoid confusion as to which Bell System organizations are responsible for particular areas. To the Bell System, a central department with overall responsibility is advantageous in that it:

- (a) Eliminates duplication of effort
- (b) Assures a consistent policy position
- (c) Maintains liaison with the FCC
- (d) Coordinates activity and presentations
- (e) Coordinates resolution of issues

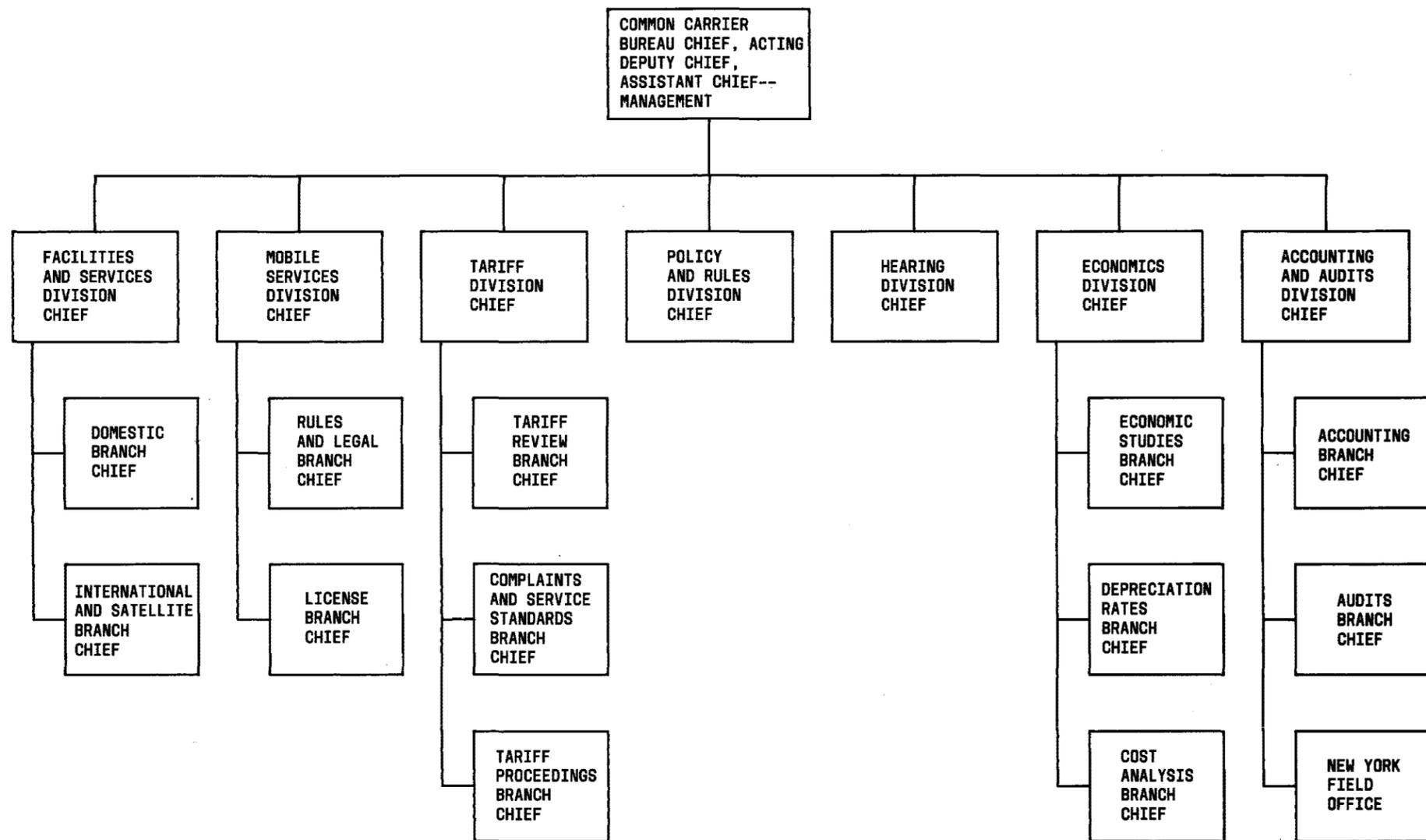


Fig. 2—FCC Common Carrier Bureau Organization

- (f) Promotes understanding of company goals
- (g) Provides advice and assistance.

The regulatory matters—interstate organization does not assume responsibility for decisions normally made by other departments. Rather, it helps develop company positions which go before the FCC. In this role it frequently calls on company experts so as to promote the best understanding by the FCC of company positions. The AT&T and associated company legal and engineering departments provide valuable support for the regulatory group.

Routine Contacts With the FCC

6.03 Normally, routine contacts with the FCC not involving policy matters are handled by the responsible AT&T department, e.g., radio licensing, interstate construction, and recurring accounting reports. Any significant developments which evolve from these routine contacts are referred to the regulatory organization. In this context, a "contact" is an informal person-to-person meeting or a conversation by telephone.

Routine Engineering Contacts With the FCC

6.04 The Technical Policy Planning Section in the engineering department of AT&T has been designated as the routine contact point with the FCC staff on radio and interstate line application matters (Fig. 3). In this capacity, the group:

- (a) Maintains liaison with various FCC staff organizations on applications
- (b) Confers with the AT&T regulatory and legal groups on policy matters

(c) Maintains liaison with the Bell System operating company organizations responsible for FCC radio and interstate line administration. In each operating company, certain individuals have been designated as the contact with AT&T engineering. Matters related to FCC administration should be referred to the company contact, who may provide the necessary assistance or consult with AT&T

(d) Receives informal questions from the FCC staff regarding a Bell System operating company application and relays them to the appropriate company contact. Replies and information which may be provided to the FCC staff informally are also relayed through the AT&T engineering group. Operating companies are generally not authorized to contact the Commission directly in these matters other than by written correspondence

(e) Provides interpretations of the requirements imposed by the Commission's Rules and Regulations

(f) Provides guidance on FCC application preparation and filing procedures

(g) Informs the operating companies of Rule or procedural changes by means of normal system correspondence or, in urgent cases, by telephone calls

(h) Participates in preparing system comments or action in special hearings or proceedings

(i) Is responsible for Bell System Practices on FCC radio and interstate line administration.

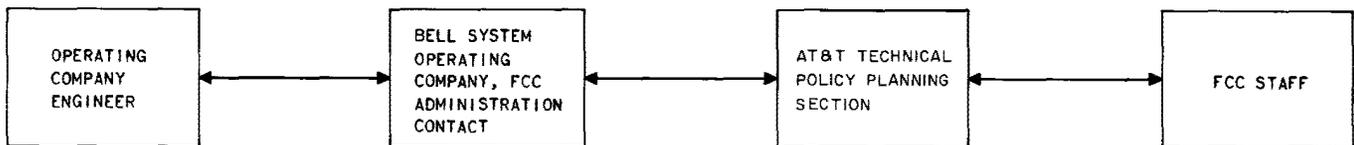


Fig. 3—Routine Engineering Contacts With the FCC

7. BELL SYSTEM PRACTICES

7.01 Specific information and guidance for Bell System personnel involved in radio and interstate line administration is available in the 400 Division of the Bell System Practices. Appendix 1 is a list of the available and proposed Practices. By specific example, instruction in the preparation of various FCC application forms, operation compliance, and a variety of related procedures and correspondence is provided. They are a "what to" and "how to" resource.

Procedural Overview

7.02 The "general" Practices on FCC administration provide an overview of the requirements and procedures for a particular type of service. By reading these Practices one may quickly gain a working knowledge and foundation in the subject area. Complete familiarity and frequent reference to the Practices is recommended for those active in the field of FCC administration.

Standardization—Quality

7.03 Each application filed with the FCC reflects on the Bell System as a whole. A properly prepared application is easier for the FCC to process and likely to receive approval in less time than one which is incomplete or difficult to understand. Any filing which requires the FCC to seek clarification

or amendment results not only in its delay, and possible rejection, but also the delay of all other applications waiting to be processed. Obviously, it is to each applicant's advantage to present an application in the best form possible. Use of the Bell System Practices should result in a quality application and standardization.

8. PUBLICATIONS AVAILABLE

8.01 A number of informative publications are available outside of the Bell System regarding the activity, trends, and subject of regulation by the FCC from:

- (a) The FCC
- (b) The U.S. Government Printing Office
- (c) Contract services
- (d) Various Government agencies.

It is essential that those concerned with FCC administration keep informed regarding rule changes, Commission interpretations, regulatory trends, competing commercial services, frequency usage by others, and the status of their own filings as found in public documents. Sources of printed information, including ordering information, may be found in Appendix 4 (Publications of Interest for FCC Administration).