

**Cathy Williams**

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**From:** Bunkin, Dorann [DBunkin@wileyrein.com]  
**Sent:** Monday, December 13, 2010 4:46 PM  
**To:** Nicholas\_A.\_Frasjer@omb.eop.gov; PRA; Cathy Williams  
**Subject:** Comments on FCC Information Collection Requirements for FCC Form 303-S - OMB Control No. 3060-0110  
**Attachments:** Clear Channel PRA Comments to Proposed Form 303-S Changes -- OMB Control 3060-0110.pdf

On behalf of Clear Channel Broadcasting Licenses, LLC, attached please find Comments on the Information Collection Requirements for the Application for Renewal of Broadcast Station License (FCC Form 303-S), OMB Control 3060-0110.

Please contact me if you have any questions or comments.

Respectfully submitted,

Dorann Bunkin



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Before the  
Office of Management and Budget  
Washington, D.C. 20503

In the Matter of	)	
	)	
	)	
Public Information Collection Being Reviewed	)	OMB Control Number: 3060-0110
by the Federal Communications Commission,	)	
Comments Requested	)	
	)	
	)	

**COMMENTS OF CLEAR CHANNEL BROADCASTING LICENSES, INC.  
ON PROPOSED INFORMATION  
COLLECTION REQUIREMENTS**

Clear Channel Broadcasting Licenses, Inc. ("Clear Channel"), licensee of numerous AM and FM radio stations, submits these comments in response to the request of the Office of Management and Budget,<sup>1</sup> and pursuant to the Paperwork Reduction Act of 1995,<sup>2</sup> on the Federal Communications Commission's ("FCC") revised collection of information for the FCC Form 303-S Application for Renewal of Broadcast Station License.

Among other items, the revision to the Form 303-S eliminates the requirement that under certain circumstances radio licensees submit an exhibit demonstrating compliance with the FCC's maximum permissible radio frequency ("RF") electromagnetic exposure limits, a change supported by Clear Channel. Specifically, Section III, Item 6 of the Form 303-S and the relevant instructions thereto,<sup>3</sup> currently requires the filing of an exhibit demonstrating compliance with the RF rules for a station ineligible or unable to show it meets these requirements using the supplied worksheets, even where the station does comply with the rules (the "RF Exhibit"). In contrast, the analogous

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<sup>1</sup> *Public Information Collection(s) Being Reviewed by the Federal Communications Commission, Comments Requested*, 75 Fed. Reg. 62816 (Oct. 13, 2010) ("OMB Notice").

<sup>2</sup> 44 U.S.C. §§ 3501-3520.

<sup>3</sup> *Form 323 Instructions* at 9-11 and *Section III, Item 6*, dated September 2009.

Form 303-S question for television and Class A stations,<sup>4</sup> as well as the one for FM and television translators and low power television (“LPTV”) facilities,<sup>5</sup> contains no RF Exhibit requirement. Applicants with compliant stations in those services need merely check a box certifying compliance with the RF rules. This discrepancy in requirements creates unjustified additional burdens for radio licensees. To comply with this obligation, Clear Channel incurs paperwork preparation costs for renewal of its radio licenses beyond those expended by television, translator and LPTV licensees for renewal of their facilities. Further, preparation of the RF Exhibit taxes its limited engineering resources. For these reasons, Clear Channel supports the proposal to eliminate the unnecessary paperwork burdens imposed on full power radio stations alone by revising Form 303-S Section III, Item 6 and the instructions thereto to eliminate the unjustified RF Exhibit requirement..

Respectfully submitted,

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<sup>4</sup> Form 323 Instructions at 28 and Section IV, Item 15, dated September 2009.

<sup>5</sup> Form 323 Instructions at 29 and Section V, Item 5, dated September 2009.