

Procedures and Guidelines for FCC Liaison Committee Submissions
Approved by the SBE Board of Directors on October 10, 2007

1. The Chairman of the SBE FCC Liaison Committee ("Chairman") will initially determine which FCC notices of proposed rule making, notices of inquiry, petitions for rule making, request for declaratory rulings, or other FCC proceedings necessitate SBE input. This preliminary determination can be at the Chair's initiative, in response to a request from any SBE officer or director, or the SBE General Counsel (GC), or the SBE Executive Director, or any member of the SBE FCC Liaison Committee ("Committee"). The primary purpose of such SBE filings shall be to comment on technical issues involving broadcast and BAS spectrum and other issues likely to impact SBE members generally.
2. Upon determining that an SBE filing may be appropriate, the Chairman shall discuss the matter by telephone with the Society's GC. In the event that the SBE GC is unavailable for a period in excess of two business days, the SBE President can be substituted.
3. Upon determining that a submission to FCC is called for, the Committee will prepare, and will at the earliest possible opportunity submit electronically to all SBE officers and directors, a notification statement concerning the proposed filing, consisting of up to two pages of text. Any director not already a member of the Committee, or any ex officio SBE officer desiring to be copied on e-mails leading up to final versions of SBE comments will, upon request to the Chairman, be copied on an ad hoc basis. In addition to SBE Liaison Committee members, copies of all drafts shall be routinely sent to the SBE President, the SBE Immediate Past President, and the Chairman of the SBE Frequency Coordination Committee.
4. The purpose of the notification statement will be to inform officers and directors of the following factors:
 - 4.1 The nature of the FCC proceeding (NPRM, NOI, PRM, Public Notice, Request for DR, Informal Objection, Petition to Deny, *etc.*)
 - 4.2 The filing or comment deadline and, if applicable, the reply comment deadline.
 - 4.3 A brief summary of the material issues in the proceeding and the proposed SBE position.
 - 4.4 If, in the opinion of the Chairman, a substantial change in the proposed SBE position should develop, or should an entirely new issue get raised, then an updated notification shall be sent to all officers and directors.
5. Should any board member or officer object to any portion of the notification statement, that concern or objection shall be timely communicated to the Chairman. The Chairman shall attempt to resolve the stated concern or objection to the satisfaction of the objecting officer or member of the Board. If the Chairman and the objecting officer or member of the Board cannot reach an accommodation, the FCC submission shall not be filed, but rather shall be referred to the SBE Executive Committee for resolution.
6. To ensure Board oversight on SBE filings, the membership of the Committee shall at all times consist of at least two persons currently serving as an SBE Officer or on the

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SBE Board of Directors. If possible, one such Officer or Director should have a “radio” background, and the other Officer or Director should have a “TV” background. Officers or Directors so serving shall be mindful of their obligation to submit any concerns regarding any draft documents in a timely manner to the Chairman. If the Chairman is also an SBE Officer or Director, his or her presence may count as one of the two required Board or Officer members.

7. As a resource to the Committee’s efforts in preparing comments the GC shall participate with the Committee by offering timely legal guidance and tactical expertise on the work product of the Committee. The Chair and the GC shall, as needed, maintain a regular line of communication during the Committee’s process of drafting comments to FCC matters. So as to most effectively use the GC’s time, and so as to minimize the GC’s workload, only the initial draft and proposed final version of SBE comments need be routinely sent to the GC. However, if in the judgment of the Chairman an intermediate draft raises issues that need the review of the GC, a copy of such intermediate draft should be sent to the GC. The covering e-mail should identify the issue or issues in question, so as to minimize the time required for the GC to review the new issue(s).
8. Because of time constraints involving FCC filings, finalized SBE comments will NOT normally require a vote of the Board before they can be filed. The procedures required by these protocols are deemed sufficient to establish oversight of the Committee’s work product and to ensure that filed comments reasonably reflect the position of the SBE. The Committee shall, however, operate on a “consensus” basis, meaning that each member of the Committee either accepts the position advocated in the document at issue or is at least willing to permit the submission to go forward in its final iteration.
9. It is recognized that the SBE President has the authority to file comments on behalf of the Society, or to authorize the filing of comments on behalf of the Society, separate from, and superior to, these protocols.
10. Once an SBE filing is made, the Society’s GC will, where appropriate, make visit(s) to the pertinent FCC staff, for the purpose of advocating the SBE’s position reflected in the filed document. When such visit(s) are made, the SBE GC will normally advise the Chairman, the SBE Executive Director and the SBE President by a brief documenting e-mail or telephone call.