

# New online public file system

## Securing stations' passcodes is essential.

BY HARRY C. MARTIN

The FCC's online public inspection file system for television (including Class A) licensees became effective in August. For the majority of stations, the new system has thus far been largely a non-event. That's because the primary impact of the new system, at least initially, has fallen on a relatively small universe of stations — *i.e.*, affiliates of ABC, CBS, NBC and Fox in the top-50 markets

— who have had to upload all new political-file materials. Stations in smaller markets, even those affiliated with the top-4 networks, do not have to upload political files until 2014.

However, the public-file rule requires that licensees in all markets upload *newly created* public-file materials (except political materials as noted) on the FCC public-file website. The first such universal public-file upload deadline — for the third-quarter issues/programs lists — was Oct. 10, 2012.

The FCC has imposed a two-tiered system for access of stations' online public files. The FCC has created a system of public-file passcodes that can be set up by each licensee and then distributed to station personnel. The licensee's FCC Registration Number (FRN) and FRN password are used to set up the passcode, but to allow staff to upload materials without sharing sensitive FRN password information with them, only the passcode is needed to access and manipulate the file.

To actually get into its own public file for uploading purposes, a licensee will need to know the station's FCC Facility ID Number (FIN) and its separate online public-file passcode.

### Securing passcodes

The FCC has designed the system with security in mind. Presumably, at the station level, there will be at least several staffers who will be responsible for getting the necessary materials uploaded. Obviously, each of them will need to have access to the necessary passcode. But it is important that access to passcodes be limited to those staffers who can be trusted to keep them secure.

If an employee familiar with the

code leaves the station's employ, licensees may want to make sure that his or her access to the file is immediately terminated. All the licensee has to do is enter the station whose passcode it wants to change into the system, and click on the "Generate New" button at the bottom of the station's information list. The public-file system will immediately give the licensee a new passcode for that station.

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The commission's system does not permit licensees to designate their own personalized passcodes. The apparently random passcodes generated by the FCC's system are likely far more secure than whatever a licensee might select.

Under the former public-file system, anyone trying to remove materials would have had to deal with the physical barriers of personnel and locked file cabinets. Under the new online system, a raider needs only two pieces of information — the station's FIN and its passcode — to get into the file from anywhere, any time of the day or night. The FIN is easily obtainable through the FCC's Consolidated Database System (CDBS), so protecting your passcode is the key to making sure no one deletes or otherwise manipulates your file.

*Harry C. Martin is a member of Fletcher, Heald and Hildreth, PLC.*



Send questions and comments to:  
[harry.martin@penton.com](mailto:harry.martin@penton.com)