



Dear Mr. Ragheb,

Hello, thanks very much for inviting Broadcast Signal Lab to inspect WCHC before. As we discussed, there are several issues that require immediate attention regarding compliance with FCC regulations. These issues are putting WCHC and the FCC license-holders, the Trustees of the College of the Holy Cross, at risk of fines and/or loss of the FCC license.

These observations are the result of an informal inspection; the problems may go deeper and in our full proposal we have recommended actions to look for other compliance issues.

There are six main issues for WCHC to deal with:

**1: EAS, Emergency Alert System:**

- There is EAS equipment present but it is not installed.
- The WCHC staff is not trained in EAS usage and procedures.

FCC 47C.F.R. Section 11.35: EAS Equipment Requirements & Section 11 in general.

**2: Transmitter Control & Metering:**

- There is a means of turning the transmitter on and off in the studios, but there is no established method or procedure for transmitter control during unattended operation by the station.
- There are no means in place to verify compliance with FCC requirements for signal modulation.
- There are no means in place to verify compliance with FCC requirements for output power of the station.

FCC 47C.F.R. Section 73.1350 Transmission system operation.  
FCC 47C.F.R. Section 73.1400 Transmission system monitoring and control.

**3: Station Log:**

- There is no FCC-compliant Station Log.

FCC 47C.F.R. Section 73.1820 Station Log

**4: Programming Control during Unattended Operation:**

- There is no means of ensuring the Legal ID is announced as close to the top of the hour as possible.

FCC 47C.F.R. Section 73.1201 Station Identification

**5: Chief Operator:**

- A specific person must be designated the "Chief Operator" of the station, and must perform the FCC-mandated duties of the CO each week. We did not see the required letter designating the CO posted in the main studio of the station.

FCC 47C.F.R. Section 73.1870(c) Chief Operators

**6: Public File:**

- FCC-mandated Public Information File is missing.
- Procedures not in place for compliance with FCC rules regarding public access to the Public File.

FCC 47C.F.R. Section 73.7527 Local public inspection file of noncommercial educational stations

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These six issues require WCHC's immediate attention. However, there are several other issues that either I noticed could use attention, or that you specifically mentioned that you wished to have addressed. These include:

- Comrex DH-20 telephone hybrid & Hotline POTS codec.
- Headphone jack for the DJ in Studio B (other headphones?).
- Mic jacks in Studio C.
- Mic booms in Studio B.
- Where exactly is the transmitter? What shape is it in? Is it broadcasting at full capacity?
- CD players overall could stand to be replaced with pro broadcast models.
- Turntable needles & cartridges - need new ones for Studio B & C.
- Remote control/mute panels for Mics 2, 3 & 4 in Studio B.
- Purchase additional microphones.

To address these issues, we recommend the following budgetary items:

**REQUIRED:** Budget \$2500 to handle all the stuff that absolutely requires attention to get the station into FCC-compliance. That's including parts and labor.

**RECOMMENDED:** Budget another \$4000 to handle all the studio maintenance & documentation that Studio B and Studio C need, including labor and purchase of several items to replace aging equipment.

**REGULAR MAINTENANCE:** Once those issues are dealt with, I recommend setting up a regular engineering schedule for me to come out once a month and keep things in shape. 8 hours/month @ \$50/hr for \$400/month or \$4800 annually (includes travel time). In addition, I would budget at least \$2000 for emergency equipment replacement & labor.

Here's a summary of our suggested budgetary figures:

FCC-required stuff:	\$2500/one-time
Studio work:	\$4000/one-time
Regular maintenance:	\$4800/annually
Emergency tech:	\$2000/annually

Bear in mind that I highly suspect that you can save some money by examining the arrangement Holy Cross has regarding music licensing fees. Also, BSL can help you set up a fundraising and underwriting program to bring in additional funds, as well as - if desired - helping you create a DJ service for hire by campus groups (WBRS/Brandeis does this to great effect). I would expect that a good portion, if not all, of these budgetary needs can be offset by increases in net revenue.

Sincerely,

**Aaron Read**  
Staff Engineer

**David Maxson**  
Senior Engineer

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