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Don't Forget To Update ASR Information

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If you purchased a television or radio station lately, you know that there are literally hundreds of details to handle after the closing. One item that is sometimes overlooked by the new owner of a station is the updating of the station's Antenna Structure Registration (ASR) to reflect the new owner's name, address and emergency contact information. Such updating is required to assure compliance with the Commission's rules. Perhaps surprisingly, the ASR information is *not* automatically updated when you (or your attorney) notify the FCC that the purchase has been consummated.

Of course, not every tower must be registered with the FCC. Generally, only towers located near airports or over 200 feet (60.96 meters) in height must be registered. A tower owner must post the tower's ASR registration number at the tower's base so that anyone can quickly identify and contact the owner if there is a problem with the tower (such as malfunctioning lights, etc.). If you are the owner of a registered tower, you are required to keep the contact information in the FCC's database current. You can do this quickly and easily through the FCC's website. The FCC does not charge a filing fee for such updates. If you know the registration number for a tower, you can find the current ownership information on file by searching the FCC's website at www.fcc.gov. Just click "e-filing" at the top of the home page, then "Antenna Structure Registration" and "Search for Registrations," and enter the registration number.

As the constant stream of fines and forfeitures reported in these pages every month demonstrates, the FCC has been extremely active lately in its enforcement efforts. Failure to maintain accurate ownership information in the Antenna Structure Registration database is frequently discovered, and cited as an additional violation, when FCC field inspectors discover physical violations at tower sites such as fencing, lighting, signage, and painting problems. Checking and keeping your ownership information up to date and accurate in the FCC's Antenna Structure database is an easy way to avoid citation for additional violations. If you have recently acquired one or more stations, you may wish to doublecheck the status of the ASR's for those stations' towers. And if you plan to acquire one or more stations in the foreseeable future, you may want to make a note to remind yourself to include updating ASR's as one more routine post-closing chore.