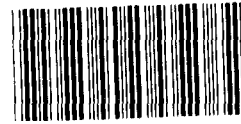155515

United States General Accounting Office

# GAO

Report to the Chairman, Government
Information, Justice, and Agriculture
Subcommittee, Committee on Government
Operations, House of Representatives

March 1988

# TELECOMMUNICATIONS

# Management and Operation of FCC's Public Reference Rooms

135313

GAO/RCED-88-83

# GAO

United States
General Accounting Office
Washington, D.C. 20548

**Resources, Community, and
Economic Development Division**

B-229139

March 4, 1988

The Honorable Glenn English
Chairman, Government Information,
   Justice, and Agriculture Subcommittee
Committee on Government Operations
House of Representatives

Dear Mr. Chairman:

In a letter dated May 11, 1987, you requested that we investigate allega-
tions that the Federal Communications Commission's (FCC) public refer-
ence rooms are difficult to use, incomplete, and out-dated. As agreed
with your office, we focused our work on reviewing FCC's management
of the public reference rooms to determine (1) ease of use, (2) whether
sufficient security is maintained, and (3) whether procedures are ade-
quate to ensure that document files are complete and up-to-date. For
comparison purposes, we visited and obtained information on reference
rooms operated by the Securities and Exchange Commission (SEC) and
the Nuclear Regulatory Commission (NRC) in Washington, D.C.

FCC is charged with regulating interstate and foreign commerce via wire
and radio communications. Falling under its authority are various media
including telephone, telegraph, radio, and television. In carrying out its
authority, FCC is heavily involved in processing applications for licenses.
FCC processes approximately 965,000 applications a year. FCC regula-
tions provide for public availability and inspection of almost all docu-
ments under its control. Accordingly, FCC operates 18 separate reference
rooms at which documents are available to the public. (See apps. I and
V.)

In summary, we found that:

• FCC reference rooms are difficult to use, especially for first-time users,
and interviews with FCC reference room users indicated that they were
not satisfied with the situation largely because FCC reference room staff
duties focus on file retrieval rather than user assistance. FCC operates its
reference rooms on a "self-help" basis, meaning limited staff assistance
is available to those using the reference room and conducting research.
In addition, FCC's guides or manuals do not provide specific, up-to-date
information to assist users. We found that both SEC and NRC published
user guides and manuals that were more informative and up-to-date.
(See app. II.)

- FCC relies primarily on an "honor system" and operates the reference rooms with limited safeguards for documents. Since most documents available for public inspection are originals, safeguarding the records is especially critical. One user that we interviewed showed us original documents that had been removed without detection from an FCC reference room. In contrast, SEC has instituted and enforces a tight security policy. (See app. III.)
- FCC document-handling procedures contributed to the problems of missing or "unable-to-locate" documents. Also, FCC's inability to deal with periodic large inflows of documents creates backlogs of unrecorded documents, which gives the appearance that documents are missing. (See app. III.)

FCC is exploring and implementing state-of-the-art reference technology in certain areas. FCC recently received the results of a study it commissioned of document-handling procedures for dockets in the FCC Office of the Secretary. The study made some recommendations toward better document safekeeping and user access. As a result of the study, the option to implement state-of-the-art videodisc technology to record docket files was under consideration by FCC. But more investigation is needed to determine what system would best serve the need. (See app. IV.)

In the meantime, FCC has issued a Public Notice announcing plans to record on microfiche the entire contents of its Mobile Services reference room to make these records available for easier access and safeguarding. Also, FCC is considering consolidation of the reference rooms in connection with a proposed relocation of its offices. However, while these actions are steps in the right direction they, alone, will neither solve the public's problems in using FCC's reference rooms nor improve the guidance and assistance provided to users.

To make the reference rooms easier to use and improve internal controls over documents, we recommend that the Chairman, Federal Communications Commission, direct the Managing Director to:

- Provide better guidance for FCC reference room users in the form of an updated users guide that would include pertinent information such as document contents, locations, access procedures, and other guidelines on all FCC reference facilities. The Managing Director should explore with users what information is needed in a user's guide to facilitate their tasks.

- Take steps to institute stronger internal controls for its documents. Such controls should ensure that all FCC documents, especially original documents, are properly handled and safeguarded.

FCC's 18 public reference rooms are located in Washington, D.C., headquarters buildings (16); in Columbia, Maryland (1); and Gettysburg, Pennsylvania (1). We visited these facilities, observing operations and interviewing officials responsible for managing and operating FCC reference rooms. We also interviewed reference room users to obtain their first-hand impressions. We also took photographs while visiting the FCC reference rooms.

At your direction, we did not obtain official agency comments on a draft of this report. However, we discussed the factual information in the report with the Managing Director. He stated that space and budget constraints have prevented FCC from making needed improvements in the reference rooms. He believes consolidation of the reference rooms and implementation of new document storage technology would help alleviate many of the problems. He stated that the consolidation was part of a plan to move the FCC headquarters offices in the near future.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of this letter. At that time, we will send copies of this report to the Office of Management and Budget; the Chairman, Federal Communications Commission; and other interested parties upon request.

This work was performed under the direction of John Luke, Associate Director. Other major contributors to this report are listed in appendix VI.

Sincerely yours,

J. Dexter Peach
Assistant Comptroller General

# Contents

## Abbreviations

| | |
|---|---|
| CFR | Code of Federal Regulations |
| FCC | Federal Communications Commission |
| GAO | General Accounting Office |
| ITS | International Transcription Service |
| OMB | Office of Management and Budget |
| SDC | System Development Corporation |
| SEC | Securities and Exchange Commission |
| NRC | Nuclear Regulatory Commission |

# Background

## Overview of FCC Operations

The Communications Act of 1934 created the Federal Communications Commission (FCC) to regulate interstate and foreign commerce via wire and radio communications. FCC's regulatory authority is divided into three major categories: common carrier services, broadcast services, and nonbroadcast radio services. Common carrier services include telephone, telegraph, facsimile, data, telephoto, audio and video broadcast program transmission, satellite transmission, and other electronic communications services for hire. Broadcast services include AM and FM broadcast radio, television, pay television, supplemental services such as television translators, and experimental and developmental services. Nonbroadcast radio services include police, fire, public safety, state and local government, aviation, marine, industrial, and land transportation services as well as the amateur and citizens band radio services. In 1962, FCC also asserted jurisdiction over cable television.

To carry out its regulatory functions, FCC has organized itself into four operating bureaus—Common Carrier, Mass Media, Private Radio, and Field Operations; and six offices—Plans and Policy, Managing Director, Administrative Law Judges, Congressional and Public Affairs, General Counsel, and Engineering and Technology. The Office of the Managing Director oversees the operations of the FCC Secretary, whose responsibility includes the Dockets Branch. FCC's fiscal year 1988 budget is $99.6 million, and it has approximately 1,835 full-time employees.

In carrying out its regulatory programs, FCC is heavily involved in processing applications for licenses or other filings, considering complaints, conducting investigations and holding hearings. For example, FCC processes approximately 965,000 applications per year. In the last decade, rapid technological changes and FCC's deregulatory activities have led to large increases in the demand for FCC services (i.e., radio licenses, private radio spectrum, and public safety channels) thus making FCC's role in maintaining public reference rooms and providing access to documents more critical.

## FCC Public Reference Room Management

FCC regulations provide for public availability and inspection of records.[1] All documents, except as otherwise specified (e.g., those covered by the Freedom of Information Act) are routinely available for public inspection. FCC regulations also provide for copies and prescribes that fees may be charged to cover the expense of searching for records made available

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[1]See 47 CFR Sections 0.441 through 0.467.

for public inspection. Public reference rooms and other locations where records may be inspected are also provided for in the regulations.

Records are routinely available for inspection in the offices of the bureau or office which exercises responsibility over the matters to which those records pertain. Those desiring to inspect the records will be directed to the specific location where particular records may be inspected. FCC users tend to be lawyers, paralegals, engineers, and private company representatives, but paralegals predominate. (Paralegals are professionals employed by law firms to perform more routine legal functions in order to free attorneys for more substantial work.) In this case, paralegals are used by lawyers practicing communications law to do research and/or collect documents for license applications, license challenges, petitions for reconsideration, or filing of comments on FCC decisions and actions. This work generally requires users to spend a great deal of time in the FCC reference rooms researching and collecting large volumes of documents.

FCC provides access to its public records at 18 separate reference rooms.[2] Three of the reference rooms are especially heavily used. Based on estimates provided to us by FCC, approximately 52 percent of users, both phone-in and walk-in, use the Mass Media (Broadcast) reference room, 25 percent use the Dockets reference room, and 6 percent use the Mobile Services reference room. (App. V has a complete listing of reference rooms, respective parent bureaus, and square footage.)

FCC provides for copies of its documents and a document search service through a contractor—International Transcription Service (ITS). ITS provides, for a fee, document search and copy services to the public, and supplies and maintains coin- and card-operated copy machines in the reference rooms.

# Objective, Scope, and Methodology

Our objective was to investigate allegations that FCC's public reference rooms are difficult to use, incomplete, and out-dated. In making our inquiry, we visited FCC reference facilities in the Washington, D.C., area and those in field locations at Gettysburg, Pennsylvania, and Columbia, Maryland. We focused particular attention on the operations of the

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[2]Documents are stored and made available for public inspection at FCC's public reference rooms. Our list (see app. V) may differ somewhat from the listing provided by FCC in 47 CFR 0.455 (a) through (f). Our list represents actual physical location—FCC's list indicates responsible bureaus and offices and what kinds of documents may be requested from them.

three most heavily used reference rooms—Mass Media, Dockets, and Mobile Services.

Although there are many suggestions about how to effectively manage libraries, archives, and reference rooms in the library science literature, we found no definitive criteria for reference room management and security. Therefore, we visited and obtained information on reference rooms operated by two other regulatory agencies—the Securities and Exchange Commission (SEC) and the Nuclear Regulatory Commission (NRC) in Washington, D.C.—to compare their operations with the FCC's.

Both agencies are responsible for the oversight and regulation of large private-sector industries, similar to FCC's regulatory mandate for the telecommunications industry. Also, both agencies' reference rooms service a body of "expert" users—not the users interested in accessing general knowledge of the type obtained in libraries or archives, but users engaged in legal, commercial, or governmental activities in which the specialized information provided through the public records in the reference rooms becomes indispensible to their work.

To conduct our work, we reviewed relevant laws and regulations; reviewed operations of all the reference rooms; and interviewed FCC managers with day-to-day responsibility for the reference rooms, bureau and office chiefs, and the Deputy Managing Director. We also interviewed representatives of the "Ad Hoc Committee on Public Access to the FCC," a group of paralegals and other frequent FCC reference room users sponsored by the Federal Communications Bar Association for accounts of their experiences in using the facilities, and took photographs of the reference rooms for the purpose of illustration.

Our review was performed during the period May through September 1987 in accordance with generally accepted government audit standards.

# FCC's Reference Rooms Are Difficult to Use

FCC reference rooms are difficult to use, especially for first-time users, largely because FCC reference room staff duties are principally to retrieve files instead of assisting users. Other major contributing factors are that FCC operates its reference rooms on a "self-help" basis and that it does not furnish adequate guides or manuals to provide specific, up-to-date information to assist users.

FCC's public reference files are housed in various places in the three buildings of FCC's Washington D.C., headquarters (approximately 1-2 blocks apart from each other), and two out-of-town sites in Gettysburg, Pennsylvania, and Columbia, Maryland. In contrast, SEC and NRC maintain centralized public reference rooms in Washington, D.C., where all records are kept together in one location. SEC and NRC also maintain regional facilities, where selected portions of their public records are kept.

## FCC's Reference Rooms Operate on a "Self-Help" Basis

FCC meets its commitment to provide access to its public records by structuring its reference rooms as "self-help" reference rooms. The advantage of a self-help reference room is that it can operate on fewer resources and be a simple document storage and retrieval area. Staff are limited to providing minimal direction and responding to file retrieval requests, which allows for more efficiency—one file clerk can serve more users within the same amount of time. However, users must be well-acquainted from the start with reference room operations, contents, and procedures for extracting the information and be able to operate on their own. Many users, especially first-time users, are not familiar with FCC reference room procedures and often need assistance. From time to time, even experienced users can be engaged in complex research and need some degree of assistance. According to knowledgeable users, in practice, if a user of the Mass Media reference room, either veteran or first-timer, asks for assistance with a particular problem, that user may get the help needed; however, that user is just as likely to be told that the staff are not responsible for educating him or her about the reference rooms.

The staff's interpretation of the FCC policy of "self-help" is that it is up to users to educate themselves and assist each other, and have told users this. On April 20, 1987, the "Ad Hoc Committee on Public Access to FCC," a Federal Communications Bar Association-sponsored group of paralegals and other frequent FCC reference room users and the FCC Managing Director's staff held a joint meeting to discuss how to use the

reference facilities and attempt to develop solutions to some of the perceived problems. The meeting was attended by approximately 100 persons. At this meeting, the "self-help" policy of the Mass Media reference room was spelled out by FCC staff. Users we spoke to were generally negative toward this interpretation of policy and instead tended to view it as an expression of lack of patience, rudeness, and unprofessionalism, and believed it would lead to complaints about the quality of service.

## Reference Rooms Lack Adequate Manuals or Guides

Since each FCC room is managed by the respective bureau or office, practices and procedures in file retrieval, file checkout, and hours of operation vary from room to room. Up-to-date FCC reference room guides reflecting any of these differing practices and procedures currently in effect are not available.

The FCC Office of Congressional and Public Affairs distributes an "Information Seeker's Guide" covering all FCC reference room facilities. This guide, however, does not incorporate specific procedural information required by potential users for each reference room in it. The Mass Media reference room, which receives the highest volume of public use, distributes a Public Reference Room Procedure Manual. But the date of the latest edition is February 1983, and hence it does not provide the latest information on document location and correct file codes.

SEC's reference room is also set up on a "self-help" basis, but SEC publishes a reference room guide (Guide to Filings Made With the U.S. Securities and Exchange Commission) that was more informative and up-to-date (Aug. 1986). SEC's guide provided specific descriptions of document contents, locations, and length of retention, and which division or office within SEC had interpretive responsibility for the document. The guide also included a floor map of SEC's reference room, and an explanation of charge-out procedures, the SEC computer system, and what to do if certain information cannot be found.

NRC publishes a reference room guide (Public Document Room File Classification System) that was also up-to-date (Aug. 1986). The listing contained detailed descriptions of the file classification system for documents available from NRC.

## Space Constraints Are a Problem

Because of space constraints, FCC located Mass Media and Dockets files together in one area, Room 239 at the 1919 M Street, N.W. (Washington, D.C.) headquarters location. (See fig. II.1.) The result, we observed, is

crowded, noisy, and run-down conditions, which create a difficult work environment. Also, because of space constraints, that part of the Mobile Services reference room located in Room 628 cannot expand. Both users and staff mentioned reference room equipment and furniture abuse, but users believed these to be isolated instances. However, users told us that every day they encounter distractions from the noise of working copy machines, talking, and traffic in and out of the reference room. FCC has taken notice of the problem, however, and since our investigation began and our photographs were taken, has remodeled the Mass Media and Dockets reference room by painting, recarpeting, and removing the copy machines to a location where they would not be as disruptive to reference room users. Also, in response to complaints about the quality of copying equipment, the International Transcription Service (ITS) installed new copy machines in May of 1987. FCC and ITS have an agreement that the machines are to be replaced yearly regardless of condition.

To complicate matters, however, no signs or markers indicate the distinction between the Mass Media and Dockets files in Room 239. One small hand-lettered sign hangs over the reference room service counter indicating hours that dockets may be retrieved. (See fig. II.2.) Also, since each set of files is tended by separate staff, users may be confused about whom to ask for assistance in retrieving files. Users encounter Dockets staffers who are unable to retrieve Mass Media files because they are not knowledgeable about Mass Media files and retrieval procedures.

Because of space constraints, we found documents and files stored in reference room aisles and hallways, which restricts movement and makes file access difficult. This is a particularly acute problem in the Mass Media/Dockets and Mobile Services reference rooms. Shelves in those reference rooms are filled to capacity. (See figs. II.3 and II.4.)

Figure II.1: FCC Mass Media/Dockets Reference Room—View of a Portion of the Room.
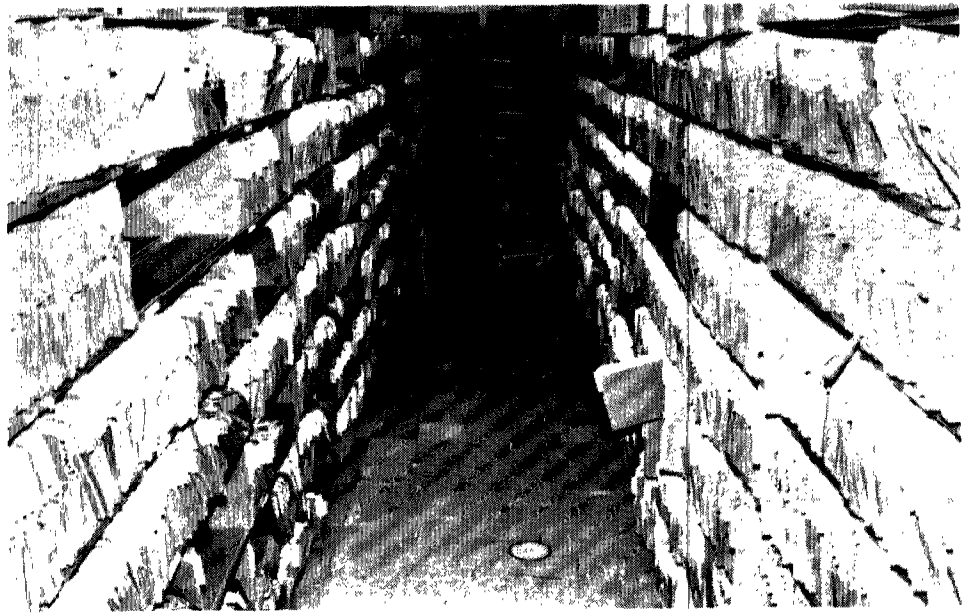


Figure II.2: FCC Mass Media/Dockets Reference Room—View From Entrance. Note Hand-Lettered Sign Indicating Docket Retrieval Hours.

Figure II.3: FCC Mobile Services Reference Room—Shelves Filled to Capacity With Overflow in Boxes.

Figure II.4: FCC Mass Media Reference Room—File Shelves.

# Files Lack Effective Internal Controls and Are Inadequately Safeguarded

FCC operates the reference rooms with limited internal controls for safeguarding documents. FCC relies primarily on an "honor system." However, since most documents available for public inspection are originals, safeguarding the records is especially critical.

## Reference Rooms Lack Effective Internal Controls

Libraries, archives, and reading rooms use various measures such as security guards, sign-out sheets, identification cards, and electronic theft detection methods to deter theft. And according to the library science literature, these measures are in some cases effective. However, with few exceptions, FCC reference rooms lack such effective internal controls for files and documents and rely instead on an "honor system" for protection. The result is an environment in which files can easily be lost, stolen, or otherwise misplaced. For example, only 6 of the 18 reference rooms appear to have any controls such as requiring FCC staff to check user identifications and/or ensuring that users sign for documents being used.

Although security guards are stationed in the 1919 M Street, N.W., headquarters lobby, their duties do not include checking briefcases or purses. No guards are posted in the other buildings or in any of the reference rooms themselves.

Sign-out sheets are a common document control technique, in the same way that library book check-out systems allow libraries to keep track of who is in possession of their books. We verified that five reference rooms do not require users to sign out documents, which prevents reference room managers and FCC's Internal Review & Security Division from keeping any solid, consistent record of document possession to trace missing files or documents.

File sign-out procedures in other reference rooms are generally lax. For instance, in the Mobile Services reference room, the file sign-out sheet was inconspicuously located on a stool next to the file shelves. File sign-out sheets used in FCC are generally not in a standardized format and do not ask for the same kind of information. Users complained about the generally poor, hard-to-read condition of the file request forms in the Mass Media reference room. The condition of the form (blurred photocopies) makes it especially difficult for users to differentiate between the codes printed on the form used to indicate what type of file is being requested.

We were told that users have successfully removed documents from the reference rooms in intentional or unintentional ignorance of the "honor system." An FCC official told us of personally stopping individuals exiting the building with docket files who told the official that they "didn't know" dockets could not be removed. Users told us that they are aware of files and documents being removed from the building in the briefcases of their colleagues. One user we interviewed, in an attempt to demonstrate to us how easy it was to remove files, showed us a file containing original documents that had been personally removed from the reference room without detection.

A recent study of the document-handling process in the Dockets Branch of the Office of the FCC Secretary by System Development Corporation (SDC) noted that dockets available for public inspection are the originals.[3] We verified this to be the case in the Mass Media and other reference rooms. This fact, plus what we learned about the removal of files, confirmed that this situation could easily create a great deal of inconvenience to the user and extra costs to FCC, which would be burdened with the task of recreating documents. FCC has estimated them to be about $471 per document, based on the average cost of staff time necessary for the task.

According to the SDC study, the average copying job is quite large: approximately 52 pages in length. Because of the large volume of copies that are made, the time pressures they are under, and dissatisfaction with the quality of copies made with copy machines installed and maintained by ITS, the study noted that users often remove documents to another location in the building or out of the building to get their copies made. If a user is forced to discard significant amounts of paper (at 8 cents a page) because of machine malfunctions, other options tend to be explored where quality and speed are guaranteed.

Reference room staffers do not verify file contents upon return. They claim that they do not have time to perform verification and, in any event, cannot be sufficiently familiar with file contents to recognize what may be missing. We were also informed that some smaller reference rooms allow direct access to files for frequent, well-known users in order to save time in staff assistance. However, this practice violates a

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[3]Ronald G. McLeod, Document Handling Process Characterization Study of the Federal Communications Commission—Dockets Branch, System Development Corporation, 1986.

specific FCC regulation[4] that prohibits user access to areas in which records are kept and also prohibits users to search the files.

Users have resorted to an alternative approach for retrieving "missing" documents. Freedom of Information Act requests have been filed by users believing such action would be the way to find missing documents that should have been available. FCC has been forced to respond that it was unable to fulfill the request because the document, the only copy in existence, was not in the files.

Some reference rooms do maintain tight security protection over their files and documents. The Domestic Facilities reference room file area of the Common Carrier Bureau is kept locked, and documents are signed out for use on the premises. (See fig. III.1.) We were told that a high incidence of theft of personal belongings and documents necessitated the security enhancements. We also verified that the reference rooms in Gettysburg, Pennsylvania, and Columbia, Maryland, also had tighter security arrangements, which required sign-in sheets and identification badges, administered by the receptionists at the entrance to each of the buildings.

In contrast, even though SEC has a high volume of users per month—by their own estimates 12,000 to 15,000 visitors and 2,500 regular users—the public has direct access to files. Also, the SEC reference room services representatives of a body of "service bureaus"—private firms listed with SEC that provide document search-and-retrieval services to interested parties for a fee. Because of these critical demands, SEC has instituted and enforces a tight security policy. In addition to the document backup, a security guard is posted at the door of the SEC reference room at all times to check purses and briefcases, and SEC has let it be known that anyone caught abusing the facilities will be subject to such punishment as being barred from the reference room for 30 days.

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[4]See 47 CFR Section 0.460(c).

**Figure III.1: FCC Domestic Facilities File Check-Out Window and Reading Room.**
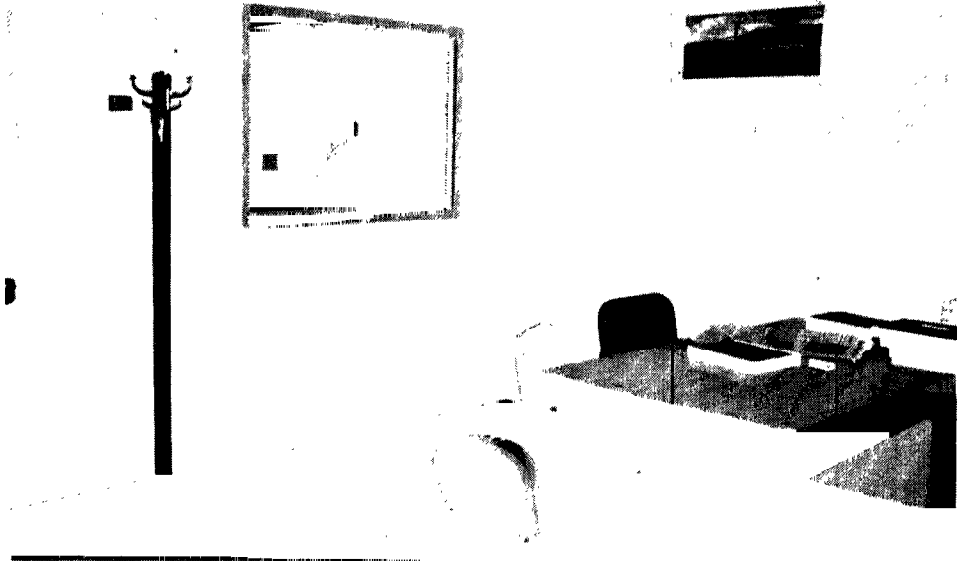


## Document-Handling Procedures Contribute to Missing Documents

Missing documents or "unable-to-locate" documents are attributable, at least in part, to FCC document-handling procedures. All documents, with the exception of Private Radio license applications sent to Gettysburg, come into the Office of the Secretary.[5] Upon receipt, a staff member stamps the date of receipt on the document and places it in a mail basket assigned to the particular bureau or office. We noted that no log-in of the document is made at that point. Staffers from the offices or bureaus located at 1919 M Street, N.W. come to the Secretary's office at the end of the day to pick up documents. (Documents directed to offices or bureaus located at the other FCC buildings are handled through the mail room located at 1919 M Street, N.W.) We were told that when there is a particularly large volume of incoming documents, some fail to be date-stamped on the correct date partially because the recording clerk often cannot work overtime, which creates an accumulation of unstamped documents.

[5]In fiscal year 1986, the last period for which FCC-wide data are available, FCC received approximately 2.45 million documents through the Office of the Secretary. Another 812,420 documents, including restricted permit requests for private radio licenses, came in to the Gettysburg, Pennsylvania, facilities.

In addition, the documents placed in categorized stacks often get mixed up in the date-stamping process. An FCC official informed us that the time of document delivery from the Office of the Secretary to the responsible bureau's public reference room can vary, in general, from 2 to 7 days. However, others have indicated that because of the process, bureau chiefs have no information that a particular document has actually been received, and that there have been circumstances when weeks passed before a document had been recorded. This has resulted in the appearance of document loss when a user requested the particular document yet to be recorded.

When documents do arrive in the FCC reference rooms, the often heavy volume occasionally creates filing backlogs. To assist with the problem, temporary workers and summer hires have been used. However, in Mobile Services, we were told that summer hires actually made filing problems worse. Because of their inexperience, files were often mislabeled and misplaced, giving the appearance that files and documents were missing and making the search for them difficult and time-consuming.

We observed one case in which FCC regulatory action led to incomplete files. In July of 1984, FCC issued a Public Notice notifying broadcast owners to suspend the filing of FCC Form 323, commonly known as the broadcast ownership report. At that time, FCC had revised the form and had provided it to the Office of Management and Budget (OMB) for approval. OMB did not give final approval for the revised form until December of 1986, and FCC did not release the form for use until March of 1987. During this nearly 3-year period, FCC did not require broadcast owners to continue using the old form to file their reports and, as a result, the ownership records were not kept updated. FCC is just now recovering from the gap in its ownership records by requiring all owners to complete and return the new form.

SEC and NRC each have approaches to document management different from FCC's. Bechtel Inc., SEC's copy contractor, is more involved in the document management process. Unlike FCC, all documents submitted to SEC are recorded on microfiche. As soon as SEC receives documents, hard copies (paper) are immediately forwarded to Bechtel. Bechtel makes all microfiche copies and backups. Other hard copies are made available simultaneously to the public and the staff during the period (about 3 to 5 days) that the microfiche is being made. The microfiche copies are then distributed to the reference room and staff. If microfiche is lost, it can be recreated from the backup.

All requests for NRC document reproduction go through NRC to its copy contractor, Facilities Management Incorporated. The user completes a reproduction form, which is forwarded to the contractor, who in turn is obligated to fulfill orders within a certain time period depending on the number of pages requested.

## Staff Access to Public Files Contributes to Inaccessibility of Dockets

Dockets are also removed by FCC staff members who must use them in their day-to-day activities. These sometimes get lost. The SDC study indicated, and we verified, that documents have been unavailable for 6 months because of staff use, and staff have often been in possession of both the original and duplicates, if any. Electronic means or other physical means are not employed to track dockets through the FCC query and inspection process. Therefore, no one can track down the identity of the FCC staffer in possession of a particular file or document. Because of this, a certain amount of the FCC public record is out of circulation at any particular time, for up to 5 or 6 months. In contrast to FCC, however, SEC staff are not allowed to use its public reference room. Instead, they use duplicate facilities located a short distance from the public reference room.

# FCC Is Exploring New Technologies for Its Out-Dated Reference Rooms

FCC reference rooms generally do not employ up-to-date file management techniques and equipment. With one exception—the cellular radio license records—no FCC documents are stored on microfiche; instead, use of microfiche is limited to compiling file indexes. Consequently, reference rooms consist entirely of huge volumes of difficult-to-manage paper documents.

To compile its file index, The Mobile Services reference room uses a "batch method" known as ENTREX, a system approximately 20 years old. The major problem with ENTREX is its poor error control; if any entry error is made, the error cannot be identified until a week after data entry. The result is an inability to quickly and accurately verify the existence of a file record; uncorrected errors can linger in the index too long, thereby misleading users searching for documents.

FCC is making progress in its efforts to improve file management and public service by exploring and implementing state-of-the-art reference technology. For example, the Industry Analysis reference room employs an "on-line" database system for receiving financial information from private companies. And the FCC Lab in Columbia, Maryland, currently operates a "Public Access System," which allows an individual or firm to access the FCC Laboratory by computer modem 7 days a week, 24 hours a day, to check on the status of its product license applications. The system has an average of 3,000 users per month.

The Office of the FCC Secretary is exploring the future implementation of "videodisc" technology in the dockets reference room. The main purpose of the SDC study mentioned earlier was to study document-handling procedures for dockets in the FCC Office of the Secretary. The study recommended a digital document storage and processing capability in order to reduce the prime physical storage space required for paper documents, and improve access and retrieval times for documents, among other things. Although we were told that as a result of the study, the option to implement state-of-the-art videodiscs to record docket files was under consideration, more investigation was needed to determine what system would best serve the need, and a small pilot project (another SDC recommendation) was under consideration.

Videodiscs promise to be an indestructible means of storing large amounts of information economically and in a small amount of space. FCC also revealed to us the broad outline of a consolidation program for its reference rooms to be taken within the context of a proposed future move to new facilities.

In September 1987, FCC issued a Public Notice announcing plans to record on microfiche the entire present and future contents of its Mobile Services reference room to make these records easier to access and safeguard.

# Listing of FCC Public Reference Rooms

| Category name | Parent bureau | Location | Reference room floor area |
|---|---|---|---|
| FCC library | Office of the Managing Director | Room 639, 1919 M St.[a] | 2,870 sq. ft. |
| Formal complaints and investigations | Common carrier | Room 6206, 2025 M St.[a] | 170 sq. ft. |
| Industry analysis | Common carrier | Room 538, 1919 M St.[a] | 320 sq. ft. |
| Informal complaints | Common carrier | Room 6202, 2025 M St.[a] | N/A |
| Legal Branch tariffs | Common carrier | Room 518, 1919 M St.[a] | N/A |
| Mass media | Mass media | Room 239, 1919 M St.[a] | 11,055 sq. ft. |
| Mobile services | Common carrier | Room 628<br>Room 209<br>1919 M St.[a] | Room 628: 763 sq. ft.<br>Room 209: 620 sq. ft. |
| Private radio | Private radio | Gettysburg, Pa. | N/A |
| Tariff review | Common carrier | Room 513<br>Room 531<br>1919 M St.[a] | Room 513: 586 sq. ft.<br>Room 531: 280 sq. ft. |
| Ownership | Mass media | Room 234, 1919 M St.[a] | N/A |
| Accounting & audits | Common carrier | Room 812, 2000 L St.[a] | 300 sq. ft. |
| Auxiliary services | Mass media | Room 7310, 2025 M St.[a] | N/A |
| Dockets | Office of the Secretary | Room 239, 1919 M St.[a] | 1,260 sq. ft. |
| Domestic facilities | Common carrier | Room 6220, 2025 M St.[a] | N/A |
| Enforcement | Mass media | Room 8210, 2025 M St.[a] | 998 sq. ft. |
| Engineering and technology | Office of Engineering and Technology | Room 7317, 2025 M St.[a] | 408 sq. ft. |
| Fairness and political programming | Mass media | Room 8210, 2025 M St.[a] | 998 sq. ft. |
| FCC Laboratory | Office of Engineering and Technology | Columbia, Md. | N/A |

[a]Located in Northwest Washington, D.C.

N/A = Not available.

# Major Contributors to This Report

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