

PROMETHEUS RADIO PROJECT

FLAME FILCHING, WAVE SNATCHING, PEOPLE-POWERED RADIO!
INFO@PROMETHEUSRADIO.ORG, WWW.PROMETHEUSRADIO.ORG
PO BOX 42158 PHILADELPHIA, PA 19101 (215) 727-9620



Changing Your LPFM Transmission or License

There are many little things you can make to improve your station that don't require authorization from the FCC. Improving your audio equipment—getting new microphones or a new audio processor, for example—can do wonders for the quality of your signal. However, if your station would like to increase the power of its broadcast or change the location of the transmitter and antenna, you might need to apply for a construction permit or file a license modification with the FCC.

This document explains the FCC rules that apply to some of the most common modifications made to LPFM stations. Unfortunately, every situation is different and there are no one-size-fits-all solutions. There are some rules that the FCC routinely bends by accepting waivers and other rules which almost always apply. The only way to really know which rules you can easily get a waiver for is to seek out help from someone experienced with FM applications like a broadcast attorney or engineer.

You can join radiospark.org for access to our on-line community of radio enthusiasts including attorneys and engineers. Also, visit our State-by-State list of legal support for non-profits at prometheusradio.org/state-legal-support-nonprofit-organizations.

Major Changes [See 47 C.F.R. Section 73.870](#)

Major changes to your LPFM can only be approved during a LPFM filing window. Since these windows occur very rarely, it is unlikely that you would be able to make a major change. If there is a circumstance, like encroachment for example, that causes you to need to relocate your transmitter more than 5.6 kilometers away from your current location, you would attempt to get a waiver from the FCC to do so.

Minor Changes (FCC Form 318) [See 47 C.F.R. Section 73.870](#), [47 C.F.R. Section 73.875\(b\)](#)

Minor change LPFM applications may be filed at anytime. Minor changes include:

- **Antenna Height:** You can move your antenna 2 meters above and 4 meters below the height specified on your license at any time. If you want to make a bigger change, you need to apply for a construction permit. For example, if your antenna is 20 meters high and your license allows you a maximum height of 30 meters, you can apply for a construction permit to build a new tower and raise your antenna to 30 meters.
- **New Tower:** You will need a construction permit to build a new tower structure for your antenna, but not if you are replacing your existing tower with a new tower of identical height and geographic coordinates.

- **Antenna Location:** You will need a construction permit for any change or correction to the geographic coordinates of your antenna. You cannot relocate your tower and antenna beyond 5.6km from its current location. This distance restriction does not apply if requested by applicants in a voluntary time-share agreement. If you need to find a new transmission site, check out our Transmission Toolkit at prometheusradio.org/transmission#transmissiontoolkit.
- **Channel/Frequency:** You can change your frequency to a 1st, 2nd, or 3rd adjacent channel, or to any frequency if you can show that the move will reduce interference. You need a construction permit for any change in your frequency. Changing your frequency is possible, but not easy. You would likely need the help of both an engineer and attorney.
- **Time-Share Agreements:** If your station operates with a time-share agreement, you and your time-sharing partners can change your agreement by submitting an application which all parties approve.

Keep in mind that you will also need to follow local ordinances and building codes when making changes to your facility. This might mean getting a municipal construction permit (completely different than the FCC construction permit) and following zoning laws.

Changes that only require a license modification (FCC Form 319)

The license modification must be submitted to the FCC no more than 10 days after beginning tests on the new system. [See 47 C.F.R. Section 73.875\(c\)](#)

- Replacement of an antenna with a similar one if it's mounted at the same height, or no more than 2 meters above and 4 meters below the height specified on your license.
- Replacement of the transmission line if it does not affect transmission power (ERP).
- Changes in hours of operation if station operates with a time-share agreement.

Waiver Requests

The FCC routinely makes exceptions to some rules through the use of waivers. For example, while the rules say LPFM stations cannot broadcast on a second adjacent channel (two channels away) from an existing station, the FCC accepts waivers to allow those stations if the applicant can prove that their broadcast will not create interference.

Waivers like these are often accepted in an encroachment situation where an LPFM station is in risk of being taken off the air. For more information about LPFM encroachment visit prometheusradio.org/transmission#encroachment_explained.