United States General Accounting Office 135317

GAO

Testimony

The Management and Operation of
FCC's Public Reference Rooms

Statement of
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Before the
Government Information, Justice
and Agriculture Subcommittee of the
Committee on Government Operations
House of Representatives

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Mr. Chairman and Members of the Subcommittee:

We welcome your invitation to discuss the Federal
Communications Commission's management of its public reference
rooms. As you are aware, the past decade has been one of explosive
growth and change in the telecommunications industry. This rapid
change has increased the importance that the public reference rooms
play in keeping the public and involved parties informed on
commission regulatory proceedings and decisions with respect to
telephone, telegraph, radio, and television.

FCC has organized itself into four operating bureaus and six
offices, with a proposed fiscal year 1989 budget of $104.7 million
and 1,888 full-time permanent positions. Each bureau or office is
responsible for maintenance of and access to its records. Also,
FCC is heavily involved in processing applications for licenses.
It processes approximately 965,000 applications a year. FCC
regulations provide for public availability and inspection of
almost all documents under its control; accordingly, FCC operates
18 separate public reference rooms.

At the request of this subcommittee, we surveyed FCC's
operation of its public reference rooms. We focused our work on
reviewing FCC's management of the reference rooms to determine (1)
ease of use, (2) whether sufficient security is maintained, and (3)
whether procedures are adequate 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. Our review findings were reported to the
Subcommittee on March 4, 1988.[1]

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[1]Telecommunications: Management and Operation of FCC's Public
Reference Rooms (GAO/RCED-88-83, March 4, 1988).

1

In summary, we found that:

-- FCC reference rooms are difficult to use, especially for
   first-time users. FCC operates its reference rooms on a
   "self-help" basis meaning limited staff assistance is
   available to those using them. In addition, FCC's guides
   or manuals do not provide specific, up-to-date information
   to assist users.

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

-- FCC document handling procedures contributed to the
   problems of missing or "unable-to-locate" documents. FCC's
   inability to deal with periodic large inflows of documents
   creates backlogs of unrecorded documents, which gives the
   appearance that documents are missing.

At this time, I will briefly elaborate on the three problems.
First, 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. This makes
it difficult for "first-time" users to use the reference rooms.

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 <u>Public</u>

<u>Reference Room Procedure Manual</u>. 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. In
comparison, both SEC and NRC published up-to-date reference room
guides. For example, SEC's August 1987 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.

The second reference room problem relates to FCC's reliance on
an "honor system" and operating its reference rooms with limited
document safeguards. 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. However, with few exceptions, FCC reference rooms
lack such 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 FCC's 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.

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. 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.

The third problem relates to FCC's document handling procedures resulting in missing or "unable-to-locate" documents. All documents, with the exception of Private Radio license applications sent to Gettysburg, come into FCC's Office of the Secretary. 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 documents 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.

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 two to seven 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 times 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 the Mobile Services reference room, we were told that summer hires actually made filing problems worse. Because of their inexperience, files were often mislabeled and misplaced, giving the

4

appearance that files and documents were missing and making the
search for them difficult and time-consuming.

In May 1986, a consulting firm, the System Development
Corporation, issued a study on FCC's dockets handling procedures in
the FCC Office of the Secretary. This report made recommendations
toward better document safekeeping and user access. One option was
to implement state-of-the-art videodiscs to record docket files
which is currently under consideration. FCC's fiscal year 1989
budget submission provides funds to begin implementing this
recommendation.

FCC issued a Public Notice in September 1987 announcing plans
to record on microfiche the contents of the reference room of the
Mobile Services Division for easier access and safeguarding. FCC
is also considering changes in connection with a proposed
relocation of its offices. However, these actions alone will
neither solve the public's problems using its reference rooms nor
improve the guidance and assistance provided to users.

Therefore, we recommended in our recently issued report that
the Chairman of the Federal Communications Commission direct the
Managing Director of the FCC 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, location,
   access procedures, and other guidelines on all FCC
   reference facilities. The Managing Director should explore
   with users what information is needed in a users' guide.

-- 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.

Mr. Chairman, this concludes our comments on the operations of the FCC public reference rooms. We would be pleased to respond to your questions.