

UNITED STATES GOVERNMENT

Memorandum

TO : Tom Campbell

DATE: March 30, 1979

FROM : Commissioner James H. Quello

SUBJECT: Response to Questions concerning professional staff of FCC Commissioners

1. PROFESSIONAL BACKGROUNDS:

I have two professional staff members, (1) a legal advisor, a lawyer with some 24 years experience with this Commission and an additional background of commercial radio broadcasting experience; (2) an administrative assistant who also serves as my engineering and technical advisor--he has an extensive background in commercial radio broadcasting and holds a 1st Class radiotelephone authorization.

2. BENEFIT FROM INCREASE IN NUMBER OF STAFF ASSISTANTS:

I presume that individual Commissioners would benefit from a modest increase in the number of staff assistants. With additional staff more time could be devoted to indepth research, and additional specialized background would be of value to my office.

3. DESIRABLE SIZE OF PERSONAL STAFF:

From a practical standpoint I believe that a professional staff of three individuals would be satisfactory for a Commissioner, i. e., legal, technical and economic functions. Utilization of these three backgrounds should provide the necessary blend of legal, business and technical views to provide a framework of reasoned decision making by a Commissioner. Specialized information can always be obtained additionally from Commission offices which can provide expertise in specific areas.

4. WHAT MIX OF PROFESSIONAL SKILLS:

Legal, technical and economic skills would appear to be the most desirable background, as indicated in the response to question 3 above.

5. COMPOSITION OF STAFF BY LEGISLATION:

Legislation should not specify the composition of Commissioners' staffs, but rather should set a limit on the number of professional staff



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available to individual Commissioners. Commissioners should not be permitted to exceed the number of permissible professional disciplines. However, Commissioners should be able to determine what professional disciplines they desire in their respective staff.

6. COMMISSIONER AND STAFF PARTICIPATION:

Speaking only for myself, I meet with my professional staff several times prior to Commission meetings in order to review those items ripe for Commission consideration. My professional staff members review such material independently and present their individual recommendations. My assistants are free to research any problem to the degree deemed necessary and to prepare papers in support of their positions. The "give and take" between the assistants and myself serves to crystalize issues of importance.

7. PLANNING OR DEVELOPING POLICY PROPOSALS:

I agree that there is need for more planning or development of policy proposals by individual Commissioners and their staff. The constant workload and limited staff substantially restrict such independent planning and development of policy proposals. However, I believe that all Commissioners have specific areas of interest or issues of concern which are given special attention or become a focal point of contention upon succeeding occasions. This is certainly so in my case. As an example, during my term in office I have repeatedly argued for codification of standards for "parties in interest" in cases of petitions to deny. I also have a continuing interest in the development of UHF television and in educational broadcasting services. With a very limited professional staff, it is often difficult to adequately develop constructive positions in a timely fashion.

8. FUNCTION OF PLANNING IN A REGULATORY BODY:

I believe there should be a specific entity established within a regulatory body for the prime purpose of long-range planning and developing policy proposals for the regulatory body. In this Commission it has been my understanding that the Office of Plans and Policy was developed for this purpose. Frankly, it has been my observation that this office does little long-range planning and that its present function seems to be more of an intermediate review of Bureau recommendations prior to Commission consideration. For example, it seems to me that the Office of Plans and Policy might well have pursued a detailed study of the implications of satellite broadcasting and the potential ramifications thereof such as the proliferation of small receive-only earth stations, the importation and wide distribution of television

signals across the country and the potential impact on the Commission's carefully structured allocations system. A long-range study of a subject such as this would be of value to the Commissioners in their deliberations as to the impact of new technologies and the degree to which they should be assimilated in the overall communications structure. In short, I believe regulatory bodies, including this Commission, should have a planning and policy development entity that performs those functions rather than engaging in oversight functions, except as may be necessary to correlate information necessary to long-range planning.

James H. Quello
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Commissioner