

## IMPACT OF THE CALM ACT ON FOX AFFILIATES

---

9 March 2012

On December 13, 2011, the FCC published rules (FCC 11-182) regarding the mitigation of commercial loudness (CALM Act).

The FOX Splicing system is designed to pass the FOX Network signal through your station without alteration. Thus the FOX Network is responsible for maintaining the average loudness of commercials and insure the loudness matches the dial-norm value of the network AC 3 signal. The FOX Network target loudness value is -24 LKFS (loudness reference to 0dB FS).

The FOX affiliate audio signal (Local) is spliced into the FOX Network audio signal. As such the local audio signal AC 3 stream needs to be compliant with the CALM Act regulations. Techniques to accomplish this can be found in the ATSC RP A/85 Requirements for Effective Digital Television Audio Loudness Management (see [www.ATSC.org](http://www.ATSC.org)).

We do not recommend inserting any audio processing downstream of the FOX Splicing System. In addition to affecting the overall audio quality, inserting a downstream processor will place the burden of resolving loudness complaints with the affiliate station without benefit of the 'safe harbor' provision of the FCC Report and Order, specifically the certification provided by the FOX Network that the network audio is compliant with the CALM rules.

The Report and Order also requires that stations perform maintenance on the monitoring equipment that includes periodic "spot checking" to ensure that equipment has not, for example, been accidentally reset to a loudness target other than -24 LKFS.

Enforcement of these rules starts on Dec 13th, 2012. We strongly recommend that the loudness of local programs and commercials match the target loudness of the local AC 3 dial\_norm value.

Questions should be addressed to Alastair Hamilton ([alastair.hamilton@fox.com](mailto:alastair.hamilton@fox.com)), 310-369-6644.