Broadcast LAW BLOG



FCC Form 396 EEO Report Due June 1st for Radio Stations in First Round of License Renewals

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With the kick-off of the FCC's broadcast license renewal cycle comes some additional obligations for licensees, this time in the form of an FCC Form 396 Broadcast EEO Report. The Form 396 is filed only at renewal time and serves to: 1.) confirm the licensee's commitment to EEO, 2.) provide a narrative statement about how the station has achieved wide outreach in the preceding two years, and 3.) provide copies of the station's two most recent Annual EEO Public File Reports (assuming that it is not exempt from the Commission's EEO rules). By June 1st, radio stations in the first batch of license renewals -- those located in Maryland, Virginia, Washington, DC, and West Virginia -- must file an FCC Form 396 EEO Report electronically with the Commission. A Form 396 must be filed by every station, even if the station has fewer than five full time employees and is thus, generally exempt from the FCC's EEO Rules. In that case, if the station has fewer than five employees, it will basically just check the box to indicate that and will not need to provide anything further. Larger stations will need to complete the entire Form.

And please note, the Form 396 Report must be filed <u>before</u> the Form 303-S License Renewal application can be submitted, as Question 2(a) in Section III of the Form 303-S requires that applicants cross-reference and specify the FCC filing number of the previously submitted Form 396 EEO Report. For more information about the EEO Annual Public File Reports and the June 1st deadline please see our <u>recent</u> advisory.

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