Broadcast LAW BLOG



Broadcast Station Reminders: License Renewal Pre- and Post-filing Announcements, EEO Public File Reports, and Noncommercial Ownership Reports due for Select States

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Just a reminder to broadcast stations in certain states of several upcoming October obligations. First up, October 3rd is the deadline for Radio Stations in Florida, Puerto Rico, and the U.S. Virgin Islands to file their FCC Form 303-S license renewal applications seeking a renewal of their broadcast licenses. (See our earlier license renewal advisory here.) Accordingly, radio stations in those state/territories will also need to begin their License Renewal Post-Filing Announcements on October 1st to inform their communities of the renewal filing. Please note, October presents a strange situation in that the deadline for filing the renewal application is not until October 3rd (because Oct. 1 is a weekend, the filing deadline rolls to Monday the 3rd), but the FCC's rules dictate that the first post-filing announcement occur on Oct. 1st. Stations that have already filed by Saturday Oct. 1st won't have an issue, but for those stations waiting until Monday to file their Form 303-S, they will need to nonetheless air the first postfiling announcement (referring to the Oct. 3rd renewal filing) on Oct. 1st. Specific language for the announcements can be found on the Commission's website here, and the post-filing announcements continue on Oct. 16, Nov. 1, Nov. 16, Dec. 1, and Dec. 16.

Second, the next batch of radio license renewals -- which will be filing their renewals on December 1st -- is **Georgia and Alabama**, which means that **Radio Stations** licensed to those states, must begin their **License Renewal Pre-Filing Announcements on October 1**. The precise language of the pre-filing announcements—which is again dictated by the FCC's Rules—can be found <u>here</u>. The pre-filing announcements for these stations continue on Oct. 16, Nov. 1, and Nov. 16.

Third, by Oct. 1, **Radio and Television** Station Employment Units (SEUs) in **Alaska**, **American Samoa**, **Florida**, **Guam**, **Hawaii**, **Iowa**, **Mariana Islands**, **Missouri**, **Oregon**, **Puerto Rico**, **the U.S. Virgin Islands and Washington** (*whew*) must prepare and place in their public inspection file their **Annual EEO Public File Report**. Stations that have websites must also post the Report on their website. The Annual EEO Public File Report summarizes the station's or the SEU's EEO activities during the previous 12 months, and provides information about the recruitment and outreach that the station conducted in the past year. A copy of our recent reminder advisory with more

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information can be found <u>here</u>. In addition, Radio Stations in Florida, Puerto Rico, and the U.S. Virgin Islands will also be filing an FCC Form 396 EEO Report by October 3 in connection with their license renewal filing.

Finally, Oct. 3rd is the deadline for *Noncommercial* Radio Stations in Alaska, American Samoa, Florida, Guam, Hawaii, Mariana Islands, Oregon, Puerto Rico, Virgin Islands, and Washington, and *Noncommercial* Television Stations in Iowa and Missouri to prepare and file an FCC Form 323 Biennial Ownership Report with the FCC. Please note, this filing date *applies only to noncommercial radio and TV stations in the states noted above*. The FCC has revised its rules regarding the reporting of ownership interests for <u>commercial</u> broadcast stations, as well as revised the commercial Ownership Report—Form 323. Accordingly, commercial stations now file biennial ownership reports on one unified filing date, which will be later this year. A copy of our recent reminder to noncommercial stations about the Oct. 3 requirement can be found here.

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