

2018 Broadcasters' Calendar

Items of Note in 2018¹

- I. *New TV Spectrum Repack Filing Deadlines:* Starting in late 2017, all full power and Class A television stations that are being repacked are required to electronically file FCC Form 2100, Schedule 387 Transition Progress Reports, on a quarterly basis. By the tenth day following each quarter, each transitioning station must inform the FCC and the public of the station's steps toward constructing facilities for its new channel and ending operations on its current channel. This reporting requirement ceases when the station has finished its transition and has filed a final report indicating that fact. Transitioning stations have been assigned to one of ten successive transition phases, each with its own timeline governing when the station may begin testing on its new channel and must cease operations on its pre-auction channel. In addition to these quarterly reports, these stations must file progress reports ten weeks before the end of their assigned construction deadline, ten days after completion of all work related to constructing their post-repack facilities, and five days after ceasing operations on their pre-auction channel. The FCC has also established several other important repack-related deadlines; more information about the specific transition phases and related deadlines can be found in [this CommLawCenter article on the subject](#).
- II. *Second Cross-Service FM Translator Window:* **January 25-31, 2018** is the next filing window for Class A and B AM stations seeking new FM translators to rebroadcast their stations. This window is available to AM stations that did not participate in the 2016 FM translator modification windows or the 2017 cross-service FM translator auction filing window. Translator licenses obtained through this window will be permanently tied to the applying AM station.
- III. *Online Public Inspection File:* By **March 1, 2018**, noncommercial educational radio stations and commercial radio stations in the Top 50 Nielsen audio markets with less than five full-time employees must complete the uploading of their public inspection file to the FCC's online file. Those in this "last wave" of stations moving their public files online do not have to upload their *Political* File by this date, but must at a minimum commence uploading their Political File documents to the FCC's online public file on a going-forward basis. Stations that do not opt to

¹ The deadlines in the **2018 Broadcasters' Calendar** are based on information known by us as of the date hereof. These deadlines may or may not apply to any particular broadcaster. These deadlines are provided for general informational purposes only and should be double-checked for currency close to each pertinent date/deadline. Actions by the FCC, Congress, or the courts could affect any of these deadlines by, for example, eliminating a particular reporting/filing obligation altogether or modifying the form used, content, deadline, fee, or manner of reporting/filing. It should also be noted that, as a general rule, when a deadline for filing a document with the FCC falls on a weekend or a federal holiday, the filing deadline will shift to the next business day. The listing of deadlines below is not intended to be complete or exhaustive of all regulatory and non-regulatory deadlines that may apply to a given broadcaster year-to-year. Accordingly, broadcasters should seek the advice of communications counsel in each instance to assure timely and proper filing. This edition of our annual Broadcasters' Calendar supersedes all prior editions and accordingly any prior editions should no longer be used.

upload their entire Political File by March 1, 2018 must continue to maintain a local “paper” Political File for pre-March 1 documents until the online Political File contains at least two years of material (the Political File document retention period).

- IV.** *Commercial and Noncommercial Biennial Ownership Report:* In 2016, the FCC adopted a new consolidated Biennial Ownership Report filing deadline of December 1 of odd-numbered years for all commercial and noncommercial broadcast stations. To accommodate the rollout of the new Licensing Management System (“LMS”), the FCC announced it would push back the 2017 filing deadline to **March 2, 2018**. All 2017 reports must reflect the ownership of the station as of October 1, 2017. Commercial broadcast stations must file FCC Form 323 (Ownership Report for Commercial Broadcast Stations), and noncommercial stations must file FCC Form 323-E (Ownership Report for Noncommercial Broadcast Stations).
- V.** *Quarterly Reporting of Noncommercial Educational Station Fundraising for Third Parties:* In 2017, the FCC modified its rules to permit noncommercial stations that do not receive funding from the Corporation for Public Broadcasting to conduct, subject to various restrictions, on-air fundraising for certain third-party non-profit organizations. As part of this rule change, the FCC requires that a station engaging in such fundraising place information on these activities in the station’s public inspection file on a quarterly basis, starting with reports for the fourth quarter of 2017. These quarterly reports must include the date, time, duration, type of activity, name of the benefitting non-profit organization, and a brief description of the cause or project. Insofar as the station helped to tally or received any funds for the non-profit group, the station must also provide an approximation of the total funds raised.
- VI.** *Non-Textual Audible Crawl Rule Goes into Effect:* In 2013, the FCC adopted the “Audible Crawl Rule,” which requires emergency information provided visually during non-newscast video programming to be made aurally accessible through a secondary audio stream. Barring a further deadline extension, on **May 26, 2018** this requirement will be extended to also include inherently visual information, such as radar maps or other graphic displays, marking the expiration of temporary waivers for such materials granted in 2015 and 2016.
- VII.** *Special Displacement Window:* In the first quarter of 2018, the FCC is expected to open a 30-day Special Displacement Window for LPTV, TV Translator, and analog-to-digital replacement translator stations to file displacement applications. Only stations deemed “operating” on April 13, 2017 will be eligible. A station can apply during this window if it is displaced by a full-power or Class A TV station being repacked in Channels 2 through 36 or by new flexible uses in the repurposed 600 MHz band.
- VIII.** *Increase in Video-Described Programming:* By **July 1, 2018**, commercial broadcast television stations in the top 60 Nielsen television markets that carry ABC, CBS, Fox, or NBC programming must increase their video-described programming from 50 hours per quarter to 87.5 hours per quarter.
- IX.** *DTV Ancillary/Supplementary Services Report:* As of publication, the FCC is considering a proposal that would modify the requirement that television stations file FCC Form 2100, Schedule G (the DTV Ancillary/Supplementary Services Report) each December 1 by instead requiring only TV stations that have provided feeable ancillary or supplementary services in the past year to file. As **December 1, 2018** approaches, stations should check to see if the requirement has indeed been modified prior to preparing their 2018 report.

- X.** *Applications for Renewal of License:* The three-year long license renewal cycle for stations in the radio services (AM, FM, FM Translator, LPFM), which ended in 2014 will not begin again until **June 1, 2019**. The license renewal cycle for broadcast stations in the television services (full-power television, Class A, LPTV, TV Translator), ended in 2015 and will not begin again until **June 1, 2020**.

January 10

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must place in their public inspection file by this date the Quarterly Issues/Programs List covering the period October 1, 2017 through December 31, 2017.

Certification of Children's Commercial Time Limitations Due—Commercial full-power and Class A television stations must place in their public inspection file by this date records "sufficient to verify compliance" with the FCC's commercial time limitations in children's programming broadcast during the period October 1, 2017 through December 31, 2017.

FCC Form 398 Children's Programming Report Due—Commercial full-power and Class A television stations must by this date electronically file FCC Form 398 demonstrating their responsiveness to "the educational and informational needs of children" for the period October 1, 2017 through December 31, 2017, and ensure a copy of the form as filed with the FCC is in the station's public inspection file.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their public inspection file sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period October 1, 2017 through December 31, 2017 and place it in their public inspection file.

Quarterly Transition Progress Reports—All full power and Class A television stations moving to a new channel during the post-incentive auction transition must file a Form 2100, Schedule 387 Transition Progress Report providing information regarding the steps taken during the period October 1, 2017 through December 31, 2017 to construct facilities for its new channel and end operations on its current channel. This reporting requirement applies regardless of whether a station is eligible for reimbursement and ceases when the station has finished its transition and has filed a final report indicating that fact.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period October 1, 2017 through December 31, 2017 and place it in their public inspection file by this date.

January 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and online simulcasters must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending November 30, 2017 by this date.

January 25

Cross-Service FM Translator Window—Class A and B AM stations may apply for new cross-service FM translator station construction permits beginning on this date. Stations that participated in either of the 2016 FM translator modification windows or the 2017 cross-service FM translator auction filing window are ineligible. The filing period ends **January 31, 2018**.

January 31

Copyright Royalty Fee: Annual Minimum Fee Statement of Account Form Due—By this date, most commercial and noncommercial webcasters and those simulcasting radio programming over the Internet **must submit the Minimum Fee Statement of Account Form** and the annual copyright royalty fee to SoundExchange. January 31 is also the date by which certain webcasters and simulcasters are eligible to make elections affecting their royalty rates and reporting requirements for the upcoming year. If your radio station is simulcast or rebroadcast over the Internet, we encourage you to consult qualified counsel with regard to your obligations.

February 1

Annual EEO Public File Report Due—Station Employment Units that have five or more full-time employees and are comprised of **radio and/or television stations** licensed to communities in **Arkansas, Kansas, Louisiana, Mississippi, Nebraska, New Jersey, New York, or Oklahoma** must by this date place in their public inspection file and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period February 1, 2017 through January 31, 2018. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [most recent EEO Advisory](#).

FCC Form 397 Mid-Term EEO Report Due—Radio Station Employment Units that have eleven or more full-time employees and are comprised of radio stations licensed to communities in **New Jersey or New York** and **Television Station Employment Units that have five or more full-time employees** and are comprised of television stations licensed to communities in **Kansas, Nebraska, or Oklahoma** must by this date electronically file with the FCC and place in their public inspection file the Mid-Term EEO Report on FCC Form 397. The Station Employment Unit's last two Annual EEO Public File Reports must be submitted with the Form 397. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [most recent EEO Advisory](#).

February 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending December 31, 2017 by this date.

March 1

Deadline for Radio Stations to Implement the Online Public File—Noncommercial educational radio stations and commercial radio stations in the Top 50 Nielsen audio markets with less than five full-time employees must complete the uploading of their public inspection file to the FCC's online file by this date. Those in this "last wave" of stations moving their public files online do not have to upload their *Political* File by this date, but must at a minimum commence uploading their Political File documents to the FCC's online public file on a going-forward basis beginning on this date.

March 2

Commercial and Noncommercial Biennial Ownership Report—Commercial stations are required to file the revised FCC Form 323 (Ownership Report for Commercial Broadcast Stations) and noncommercial stations must file the revised FCC Form 323-E (Ownership Report for Noncommercial Broadcast Stations) in the new Licensing Management System (LMS) by this date. All reports must be accurate as of October 1, 2017. In cases where a broadcast station is sold between October 1, 2017 and the filing date, a biennial ownership report must be filed by the party that owned the station as of October 1, 2017. Going forward, biennial ownership reports will be due December 1 of odd-numbered years.

March 17

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending January 31, 2018 by this date.

March 31

EEO 1 Report Due—Broadcasters that are subject to the federal Equal Employment Opportunity Commission's (EEOC) reporting requirements must electronically file their EEO 1 Report (Form 100) by this date. Private employers that have 100 or more employees at a single establishment or collectively have 100 or more employees at multiple establishments, as well as certain federal contractors, are generally subject to this requirement and must complete the report based on employment data from a single pay period during October, November, or December 2017. We encourage you to consult with counsel on the filing and visit <http://www.eeoc.gov/employers/eeo1survey> for additional background.

April 1

Annual EEO Public File Report Due—Station Employment Units that have five or more full-time employees and are comprised of **radio and/or television stations** licensed to communities in **Delaware, Indiana, Kentucky, Pennsylvania, Tennessee, or Texas** must by this date place in their public inspection file and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period April 1, 2017 through March 31, 2018. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [most recent EEO Advisory](#).

FCC Form 397 Mid-Term EEO Report Due—Radio Station Employment Units that have eleven or more full-time employees and are comprised of radio stations licensed to communities in **Delaware or Pennsylvania**, and **Television Station Employment Units that have five or more full-time employees** and are comprised of television stations licensed to communities in **Texas** must by this date electronically file with the FCC and place in their public inspection file the Mid-Term EEO Report on FCC Form 397. The Station Employment Unit's last two Annual EEO Public File Reports must be submitted with the Form 397. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [most recent EEO Advisory](#). **Note that because this filing deadline falls on a weekend, submission of this item to the FCC may be made on April 2.**

April 10

Quarterly Issues/Programs List Due—All **full-power radio, full-power television, and Class A television stations** must place in their public inspection file by this date the Quarterly Issues/Programs List covering the period January 1, 2018 through March 31, 2018.

Certification of Children's Commercial Time Limitations Due—Commercial full-power and Class A television stations must place in their public inspection file by this date records "sufficient to verify compliance" with the FCC's commercial time limitations in children's programming broadcast during the period January 1, 2018 through March 31, 2018.

FCC Form 398 Children's Programming Report Due—Commercial full-power and Class A television stations must by this date electronically file FCC Form 398 demonstrating their responsiveness to "the educational and informational needs of children" for the period January 1, 2018 through March 31, 2018, and ensure a copy of the form as filed with the FCC is in the station's public inspection file.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their public inspection file sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period January 1, 2018 through March 31, 2018 and place it in their public inspection file.

Quarterly Transition Progress Reports—All full power and Class A television stations moving to a new channel during the post-incentive auction transition must file a Form 2100, Schedule 387 Transition Progress Report providing information regarding the steps taken during the period January 1, 2018 through March 31, 2018 to construct facilities for its new channel and end operations on its current channel. This reporting requirement applies regardless of whether a station is eligible for reimbursement and ceases when the station has finished its transition and has filed a final report indicating that fact.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period January 1, 2018 through March 31, 2018 and place it in their public inspection file by this date.

April 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending February 28, 2018 by this date.

May 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must submit by this date the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending March 31, 2018 by this date.

May 26

Limited Audible Crawl Waiver Expires—All television broadcasters must expand their aural conveyance of visual emergency information to include inherently graphical information, such as Doppler radar or weather maps. See *Item of Note VI* above for additional details.

June 1

Annual EEO Public File Report Due—Station Employment Units that have five or more full-time employees and are comprised of **radio and/or television stations** licensed to communities in **Arizona**,

the District of Columbia, Idaho, Maryland, Michigan, Nevada, New Mexico, Ohio, Utah, Virginia, West Virginia, or Wyoming must by this date place in their public inspection file and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period June 1, 2017 through May 31, 2018. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [most recent EEO Advisory](#).

FCC Form 397 Mid-Term EEO Report Due—Television Station Employment Units that have five or more full-time employees and are comprised of television stations licensed to communities in **Arizona, Idaho, Nevada, New Mexico, Utah, or Wyoming** must by this date electronically file with the FCC and place in their public inspection file the Mid-Term EEO Report on FCC Form 397. The Station Employment Unit's last two Annual EEO Public File Reports must be submitted with the Form 397. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [most recent EEO Advisory](#).

June 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must submit to SoundExchange the Monthly Report of Use and Monthly Usage Statement of Account forms for the month ending April 30, 2018 by this date.

July 1

Increase in Video-Described Programming Begins—Commercial broadcast stations that are affiliates of ABC, CBS, Fox, or NBC and are located in the top 60 television markets must increase their video-described programming from 50 hours per quarter to 87.5 hours per quarter.

July 10

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must place in their public inspection file by this date the Quarterly Issues/Programs List covering the period April 1, 2018 through June 30, 2018.

Certification of Children's Commercial Time Limitations Due—Commercial full-power and Class A television stations must place in their public inspection file by this date records "sufficient to verify compliance" with the FCC's commercial time limitations in children's programming broadcast during the period April 1, 2018 through June 30, 2018.

FCC Form 398 Children's Programming Report Due—Commercial full-power and Class A television stations must by this date electronically file FCC Form 398, demonstrating their responsiveness to "the educational and informational needs of children" for the period April 1, 2018 through June 30, 2018, and ensure a copy of the form as filed with the FCC is in the station's public inspection file.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their public inspection file sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period April 1, 2018 through June 30, 2018 and place it in their public inspection file.

Quarterly Transition Progress Reports—All full power and Class A television stations moving to a new channel during the post-incentive auction transition must file a Form 2100, Schedule 387 Transition Progress Report providing information regarding the steps taken during the period April 1, 2018 through June 30, 2018 to construct facilities for its new channel and end operations on its current channel. This reporting requirement applies regardless of whether a station is eligible for reimbursement and ceases when the station has finished its transition and has filed a final report indicating that fact.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period April 1, 2018 through June 30, 2018 and place it in their public inspection file by this date.

July 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending May 31, 2018 by this date.

July 31

Copyright Royalty Claims Due—Television stations with locally-produced programming whose signals were carried as distant signals by at least one cable or satellite system in 2017 are eligible to file royalty claims for compensation with the Copyright Office in Washington, DC by this date. Under the federal Copyright Act, cable systems and satellite operators must pay "compulsory license" royalties to carry distant TV signals on their systems. The royalties are used to compensate the owners of copyrighted works broadcast on those signals. Stations that do not file claims by the deadline will not be able to collect royalties for carriage of their signals during 2017.

August

Regulatory Fees Announced—The FCC is expected to release a Public Notice this month indicating the date by which annual regulatory fees must be filed and the amounts of those fees. Broadcasters should remain alert for this announcement.

August 1

Annual EEO Public File Report Due—Station Employment Units that have five or more full-time employees and are comprised of **radio and/or television stations** licensed to communities in **California, Illinois, North Carolina, South Carolina, or Wisconsin** must by this date place in their public inspection file and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period August 1, 2017 through July 31, 2018. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [most recent EEO Advisory](#).

FCC Form 397 Mid-Term EEO Report Due—Television Station Employment Units that have five or more full-time employees and are comprised of television stations licensed to communities in **California** must by this date electronically file with the FCC and place in their public inspection file the Mid-Term EEO Report on FCC Form 397. The Station Employment Unit's last two Annual EEO Public File Reports must be submitted with the Form 397. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [most recent EEO Advisory](#).

August 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending June 30, 2018 by this date.

September 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must by this date submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending July 31, 2018 by this date.

Post-Auction Repack Transition Testing—Transition Phase 1 testing begins. See *Item of Note 1* above for additional information.

October 1

Annual EEO Public File Report Due—Station Employment Units that have five or more full-time employees and are comprised of **radio and/or television stations** licensed to communities in **Alaska, Florida, Hawaii, Iowa, Missouri, Oregon, Washington, American Samoa, Guam, the Mariana Islands, Puerto Rico, Saipan, or the Virgin Islands** must by this date place in their public inspection file and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period October 1, 2017 through September 30, 2018. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [most recent EEO Advisory](#).

FCC Form 397 Mid-Term EEO Report Due—Television Station Employment Units that have five or more full-time employees and are comprised of television stations licensed to communities in **Alaska, Hawaii, Oregon, Washington, American Samoa, Guam, the Mariana Islands, or Saipan** must by this date electronically file with the FCC and place in their public inspection file the Mid-Term EEO Report on FCC Form 397. The Station Employment Unit's last two Annual EEO Public File Reports must be submitted with the Form 397. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [most recent EEO Advisory](#).

October 10

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must place in their public inspection file by this date the Quarterly Issues/Programs List covering the period July 1, 2018 through September 30, 2018.

Certification of Children's Commercial Time Limitations Due—Commercial full-power and Class A television stations must place in their public inspection file by this date records "sufficient to verify compliance" with the FCC's commercial time limitations in children's programming broadcast during the period July 1, 2018 through September 30, 2018.

FCC Form 398 Children's Programming Report Due—Commercial full-power and Class A television stations must by this date electronically file FCC Form 398, demonstrating their responsiveness to "the educational and informational needs of children" for the period July 1, 2018 through September 30, 2018, and ensure a copy of the form as filed with the FCC is in the station's public inspection file.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their public inspection file sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period July 1, 2018 through September 30, 2018 and place it in their public inspection file.

Quarterly Transition Progress Reports—All full power and Class A television stations moving to a new channel during the post-incentive auction transition must file a Form 2100, Schedule 387 Transition Progress Report providing information regarding the steps taken during the period July 1, 2018 through September 30, 2018 to construct facilities for its new channel and end operations on its current channel. This reporting requirement applies regardless of whether a station is eligible for reimbursement and ceases when the station has finished its transition and has filed a final report indicating that fact.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period July 1, 2018 through September 30, 2018 and place it in their public inspection file by this date.

October 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending August 31, 2018 by this date.

November 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending September 30, 2018 by this date.

November 30

Post-Auction Repack Transition Testing—Transition Phase 1 testing ends. See *Item of Note I* above for additional information.

December 1

Annual EEO Public File Report Due—Station Employment Units that have five or more full-time employees and are comprised of radio and/or television stations licensed to communities in **Alabama, Colorado, Connecticut, Georgia, Maine, Massachusetts, Minnesota, Montana, New Hampshire, North Dakota, Rhode Island, South Dakota, or Vermont** must by this date place in their public inspection file and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period December 1, 2017 through November 30, 2018. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [most recent EEO Advisory](#).

FCC Form 397 Mid-Term EEO Report Due—Television Station Employment Units that have five or more full-time employees and are comprised of television stations licensed to communities in **Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, or Vermont** must by this date electronically file with the FCC and place in their public inspection file the Mid-Term EEO Report on FCC

Form 397. The Station Employment Unit's last two Annual EEO Public File Reports must be submitted with the Form 397. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [most recent EEO Advisory](#). **Note that because this filing deadline falls on a weekend, submission of this item to the FCC may be made on December 3.**

FCC Form 2100, Schedule G, Annual DTV Ancillary/Supplementary Services Report Due (formerly FCC Form 317)—Commercial television, digital Class A television, and digital LPTV stations must by this date electronically file FCC Form 2100, Schedule G with the FCC, reporting whether or not they have provided ancillary or supplementary services in the past year. Concurrent with its filing, if a digital station provided feeable ancillary or supplementary services during the 12-month period ending on the preceding September 30, the station is required to pay the FCC five percent of the gross revenue from such services. The FCC has proposed eliminating this filing requirement for stations that did not provide feeable ancillary or supplementary services in the prior year, so stations should check to see if this requirement has been modified prior to preparing their 2018 report. See *Item of Note IX* above for additional information. **Note that because this filing deadline falls on a weekend, submission of this item to the FCC may be made on December 3.**

Post-Auction Repack Transition Testing—Transition Phase 2 testing begins. See *Item of Note I* above for additional information.

December 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending October 31, 2018 by this date.

For further information about this Advisory, please contact any of the following attorneys in the Communications Practice Group.

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