

## 2019 Broadcasters' Calendar

### Items of Note in 2019<sup>1</sup>

- I. *Applications for Renewal of License:* The three-year long license renewal cycle for stations in the radio services (AM, FM, FM Translator, and LPFM) will begin on **June 1, 2019**. The date by which the licensee must file a station's application for license renewal depends on the state or territory of the station's community of license. All licensees should familiarize themselves now with the dates associated with this important filing, including the dates on which public notice announcements must air in advance of the license renewal filing, the filing deadline itself (which is approximately four months before the date of license expiration), and the dates on which post-filing announcements must air. The next license renewal cycle for broadcast stations in the television services (full-power television, Class A, TV Translator, and LPTV) will not begin again until **June 1, 2020**.
- II. *Commercial and Noncommercial Biennial Ownership Report:* **December 2, 2019** is the deadline by which all commercial and noncommercial radio and television stations must file their biennial ownership reports. Commercial stations will file FCC Form 2100, Schedule 323 ("Form 323"), and noncommercial stations will file FCC Form 2100, Schedule 323-E ("Form 323-E"). While these licensees may have filed a biennial report as recently as March 2018, that report fulfilled the reporting obligation for the period that ended on October 1, 2017. The deadline was adjusted to allow for the implementation of revised report forms to be filed using the FCC's Licensing and Management System ("LMS"). The new filing window opens October 1, 2019, and the information in all ownership reports must be accurate as of that date.
- III. *TV Spectrum Repack Filing Deadlines:* TV stations transitioning to a new channel in the spectrum repack 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 when it must cease operations on its pre-auction channel. Since late 2017, all full power and Class A television stations that are being repacked have been required to electronically file FCC Form 2100,

<sup>1</sup> The deadlines in the **2019 Broadcasters' Calendar** are based on information known as of the date hereof and may or may not apply to any particular broadcaster. They 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 shifts to the next business day. The listing 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.

Schedule 387 ("Form 387") by the tenth day following each calendar quarter. These Transition Progress Reports detail a station's current progress in constructing facilities for its new channel and ending operations on its current channel. This reporting requirement continues until the station has finished its transition and has filed a final report indicating that fact. In addition to these quarterly reports, transitioning 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 [our CommLawCenter article on the subject](#).

- IV.** *DTV Ancillary/Supplementary Services Report:* The FCC modified the requirement that all television stations file FCC Form 2100, Schedule G (the DTV Ancillary/Supplementary Services Report) by December 1 of each year by instead requiring that only those TV stations which have provided feeable ancillary or supplementary services in the past year file it. Concurrent with the filing, these stations are required to pay the FCC five percent of the gross revenues received for such services.

## 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, 2018 through December 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 October 1, 2018 through December 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 2100, Schedule 398 ("Form 398") demonstrating their responsiveness to "the educational and informational needs of children" for the period October 1, 2018 through December 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 October 1, 2018 through December 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 repack** must file a Form 387 Transition Progress Report providing information regarding the steps taken during the period October 1, 2018 through December 31, 2018 to construct facilities for their new channel and end operations on their current channel. This reporting requirement applies regardless of whether a station is eligible for reimbursement and continues until 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, 2018 through December 31, 2018 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 those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending November 30, 2018 by this date.

### January 31

**Copyright Royalty Fee: Annual Minimum Fee Statement of Account Form Due**—By this date, most commercial and noncommercial webcasters and those broadcast stations simulcasting their 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 those broadcast stations simulcasting their programming over the Internet 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, 2018 through January 31, 2019. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

**FCC Form 397 Mid-Term EEO Report Due—Station Employment Units** that are comprised of **television stations** licensed to communities in **New Jersey or New York** 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 [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 broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending December 31, 2018 by this date.

### March 17

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending January 31, 2019 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 2018. We encourage you to consult with counsel on the filing and visit <http://www.eeoc.gov/employers/eeo1survey> for additional background.

### April 1

**Pre-filing License Renewal Announcements for Radio Stations—Full power AM and FM radio stations** licensed to communities in the **District of Columbia, Maryland, Virginia, or West Virginia** must on this date begin to air their pre-filing license renewal announcements in accordance with the FCC's regulations.

**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, 2018 through March 31, 2019. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

**FCC Form 397 Mid-Term EEO Report Due—Station Employment Units** that are comprised of **television stations** licensed to communities in **Delaware or Pennsylvania** 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 [EEO Advisory](#).

### 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, 2019 through March 31, 2019.

**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, 2019 through March 31, 2019.

**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, 2019 through March 31, 2019, 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, 2019 through March 31, 2019 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 repack** must file a Form 387 Transition Progress Report providing information regarding the steps taken during the period January 1, 2019 through March 31, 2019 to construct facilities for their new channel and end operations on their current channel. This reporting requirement applies regardless of whether a station is eligible for reimbursement and continues until 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, 2019 through March 31, 2019 and place it in their public inspection file by this date.

### April 12

**Phase 2 Post-Auction Repack Transition Termination Date**—Stations assigned to Transition Phase 2 must cease operating on their pre-auction channel by this date. See *Item of Note 1* above for additional information.

### April 13

**Phase 3 Post-Auction Repack Transition Testing Commencement Date**—Transition Phase 3 testing begins. See *Item of Note 1* above for additional information.

### April 14

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending February 28, 2019 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 broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending March 31, 2019 by this date.

### June 1

**Filing of Applications for Renewal of Licenses for Radio Stations—AM, FM, FM Translator and LPFM stations** licensed to communities in the **District of Columbia, Maryland, Virginia, or West Virginia** must electronically file their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396 by this date, and commercial stations must promptly submit their FCC license renewal application filing fee. **Note that because this filing deadline falls on a weekend, submission of this item to the FCC may be made on June 3.**

**Post-filing License Renewal Announcements for Radio Stations—Full-power AM and FM radio stations** licensed to communities in the **District of Columbia, Maryland, Virginia, or West Virginia** must

begin on this date to air their post-filing license renewal announcements in accordance with the FCC's regulations. **FM Translator stations** licensed to communities in these jurisdictions must arrange for the required newspaper public notice of their license renewal application filing.

**Pre-filing License Renewal Announcements for Radio Stations—Full-power AM and FM radio stations** licensed to communities in **North Carolina or South Carolina** must on this date begin to air their pre-filing license renewal announcements in accordance with the FCC's regulations.

**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, 2018 through May 31, 2019. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [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 broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending April 30, 2019 by this date.

### June 21

**Phase 3 Post-Auction Repack Transition Termination Date**—Stations assigned to Transition Phase 3 must cease operating on their pre-auction channel by this date. See *Item of Note 1* above for additional information.

### June 22

**Phase 4 Post-Auction Repack Transition Testing Commencement Date**—Transition Phase 4 testing begins. See *Item of Note 1* above for additional information.

### 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, 2019 through June 30, 2019.

**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, 2019 through June 30, 2019.

**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, 2019 through June 30, 2019, 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, 2019 through June 30, 2019 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 repack** must file a Form 387 Transition Progress Report providing information regarding the steps taken during the period April 1, 2019 through June 30, 2019 to construct facilities for their new channel and end operations on their current channel. This reporting requirement applies regardless of whether a station is eligible for reimbursement and continues until 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, 2019 through June 30, 2019 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 broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending May 31, 2019 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 2018 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 2018.

### August 1

**Filing of Applications for Renewal of Licenses for Radio Stations—AM, FM, FM Translator and LPFM stations** licensed to communities in **North Carolina or South Carolina** must electronically file their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396 by this date, and commercial stations must promptly submit their FCC license renewal application filing fee.

**Post-filing License Renewal Announcements for Radio Stations—Full-power AM and FM radio stations** licensed to communities in **North Carolina or South Carolina** must begin on this date to air their post-filing license renewal announcements in accordance with the FCC's regulations. **FM Translator stations** licensed to communities in these states must arrange for the required newspaper public notice of their license renewal application filing.

**Pre-filing License Renewal Announcements for Radio Stations—Full-power AM and FM radio stations** licensed to communities in **Florida, Puerto Rico, or the Virgin Islands** must on this date begin to air their pre-filing license renewal announcements in accordance with the FCC's regulations.

**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, 2018 through July 31, 2019. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

**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 watch for this announcement.

### August 2

**Phase 4 Post-Auction Repack Transition Termination Date**—Stations assigned to Transition Phase 4 must cease operating on their pre-auction channel by this date. See *Item of Note 1* above for additional information.

### August 3

**Phase 5 Post-Auction Repack Transition Testing Commencement Date**—Transition Phase 5 testing begins. See *Item of Note 1* above for additional information.

### August 14

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending June 30, 2019 by this date.

### September 6

**Phase 5 Post-Auction Repack Transition Termination Date**—Stations assigned to Transition Phase 5 must cease operating on their pre-auction channel by this date. See *Item of Note 1* above for additional information.

### September 7

**Phase 6 Post-Auction Repack Transition Testing Commencement Date** —Transition Phase 6 testing begins. See *Item of Note 1* above for additional information.

### September 14

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending July 31, 2019 by this date.



## October 1

**Filing of Applications for Renewal of Licenses for Radio Stations—AM, FM, FM Translator and LPFM stations** licensed to communities in **Florida, Puerto Rico, or the Virgin Islands** must electronically file their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396 by this date, and commercial stations must promptly submit their FCC license renewal application filing fee.

**Post-filing License Renewal Announcements for Radio Stations—Full-power AM and FM radio stations** licensed to communities in **Florida, Puerto Rico, or the Virgin Islands** must begin on this date to air their post-filing license renewal announcements in accordance with the FCC's regulations. **FM Translator stations** licensed to communities in these jurisdictions must arrange for the required newspaper public notice of their license renewal application filing.

**Pre-filing License Renewal Announcements for Radio Stations—Full-power AM and FM radio stations** licensed to communities in **Alabama or Georgia** must on this date begin to air their pre-filing license renewal announcements in accordance with the FCC's regulations.

**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, 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, 2018 through September 30, 2019. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [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, 2019 through September 30, 2019.

**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, 2019 through September 30, 2019.

**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, 2019 through September 30, 2019, 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, 2019 through September 30, 2019 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 repack** must file a Form 387 Transition Progress Report providing information

regarding the steps taken during the period July 1, 2019 through September 30, 2019 to construct facilities for their new channel and end operations on their current channel. This reporting requirement applies regardless of whether a station is eligible for reimbursement and continues until 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, 2019 through September 30, 2019 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 broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending August 31, 2019 by this date.

### October 18

**Phase 6 Post-Auction Repack Transition Termination Date**—Stations assigned to Transition Phase 6 must cease operating on their pre-auction channel by this date. See *Item of Note 1* above for additional information.

### October 19

**Phase 7 Post-Auction Repack Transition Testing Commencement Date**—Transition Phase 7 testing begins. See *Item of Note 1* above for additional information.

### November 14

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending September 30, 2019 by this date.

### December 1

**Filing of Applications for Renewal of Licenses for Radio Stations**—AM, FM, FM Translator and LPFM stations licensed to communities in **Alabama or Georgia** must electronically file their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396 by this date, and commercial stations must promptly submit their FCC license renewal application filing fee. ***Note that because this filing deadline falls on a weekend, submission of this item to the FCC may be made on December 2.***

**Post-filing License Renewal Announcements for Radio Stations—Full-power AM and FM radio stations** licensed to communities in **Alabama or Georgia** must begin on this date to air their post-filing license renewal announcements in accordance with the FCC's regulations. **FM Translator stations** licensed to communities in these states must arrange for the required newspaper public notice of their license renewal application filing.

**Pre-filing License Renewal Announcements for Radio Stations—Full-power AM and FM radio stations** licensed to communities in **Arkansas, Louisiana, or Mississippi** must on this date begin to air their pre-filing license renewal announcements in accordance with the FCC's regulations.

**Commercial and Noncommercial Biennial Ownership Reports Due**—Commercial stations are required to file 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) by this date. All reports must be accurate as of October 1, 2019. In cases where a broadcast station is sold between October 1, 2019 and the filing date, a biennial ownership report must be filed by the party that owned the station as of October 1, 2019. ***Note that because this filing deadline falls on a weekend, submission of this item to the FCC may be made on December 2.***

**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, 2018 through November 30, 2019. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

**FCC Form 2100, Schedule G, Annual DTV Ancillary/Supplementary Services Report Due—Commercial television, digital Class A television, and digital LPTV stations** that provided feeable ancillary or supplementary services during the 12-month period ending on September 30, 2019 must by this date electronically file FCC Form 2100, Schedule G with the FCC. Concurrent with its filing, the station is required to pay the FCC five percent of the gross revenue from such services. ***Note that because this filing deadline falls on a weekend, submission of this item to the FCC may be made on December 2.***

### December 15

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending October 31, 2019 by this date.

### December 31

**Pillsbury's 2020 Broadcasters' Calendar**—By this date, broadcast stations in all states should ensure they have obtained a copy of Pillsbury's *2020 Broadcasters' Calendar*, and be prepared for another fun-filled year of regulatory deadlines.

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

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