

License Renewal Application Package

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The license renewal process brings with it scrutiny of each broadcast station, its programming, its rule compliance record, and its past performance in serving its community. This scrutiny comes not just from the FCC, but from national and local special interest groups, trade associations, competitors, former employees, and community organizations. Even where a license renewal application goes unchallenged, the path to license renewal can be difficult. Whether it is simply failing to file the application or filing fee on time, or incorrectly responding to one of the many certifications required by the FCC, an experienced hand can avoid unnecessary complications.

In the last license renewal cycle, the FCC was not shy about issuing fines to stations for violations that came to light during the license renewal process, including cases where the applicant “self-disclosed” the violation to the FCC. Of course, even unfounded allegations about a license renewal applicant will delay processing of its license renewal application, as well as processing of its other FCC applications, including assignments or transfers. Taking steps now to manage the license renewal process can save stations time, money, and resources that would otherwise need to be dedicated to defending their record before the FCC.

A Different Approach to the License Renewal Process

Over the decades, Pillsbury’s Communications group has assisted thousands of radio and television stations in understanding and navigating the complexities and risks involved in the FCC’s license renewal process. We have now created an online interactive license renewal questionnaire that greatly simplifies the license renewal process. We think most stations will prefer it to wading through the entire 42 pages of instructions, worksheets, and questions contained within FCC Form 303-S, the FCC’s license renewal application, and FCC Form 396, the EEO Program Report that must be filed with the Form 303-S. Because it is interactive, the questionnaire automatically modifies itself based upon the answers a station provides, eliminating the need for stations to struggle through material that is not applicable to their particular situation.

To encourage radio stations to avail themselves of experienced communications counsel, Pillsbury is offering a flat fee License Renewal Application Package that includes the following services:

1. Instructions for airing the pre-filing and post-filing license renewal announcements;
2. Access to our online questionnaire, which provides us with the information needed to prepare the license renewal application and EEO Program Report;
3. Notification and assessment of license renewal-related issues raised by a station’s responses to the online questionnaire;
4. License renewal application drafting, including routine exhibits;

5. EEO Program Report drafting, including routine exhibits;
6. Electronic filing of the license renewal application and EEO Program Report, as well as submission of the associated filing fee (funds for the filing fee to be separately provided by the station); and
7. Instructions for the required license renewal public notice certification for placement in the station's public inspection file.

The list above is meant to provide only a general overview of the package. The definitive terms governing the package are outlined in Pillsbury's Engagement Letter for the License Renewal Application Package.

Pillsbury's License Renewal Application Package Fee

Pillsbury is currently providing these legal services for a flat fee of \$1750 per radio station. The flat fee does not include non-legal expenses such as the cost of the FCC filing fee or any incidental costs (e.g., couriers). Any out-of-pocket charges will be invoiced at their cost to Pillsbury.

Associated auxiliary and booster stations that are covered by the license renewal application for the main station are covered by the flat fee as well. Supplemental license renewal applications for FM translators will carry a flat fee of \$750 for each FM translator license requiring a separate application filing.

For most stations, the standard package described above will be sufficient to complete the application filing process. However, as part of the package, Pillsbury will provide requested additional legal services related to a station's license renewal application at a 10 percent discount to its normal rates. This discount would apply, for example, to:

1. Conducting a pre-renewal station due diligence analysis;
2. Drafting or editing any exhibits intended to demonstrate to the FCC that the licensee has taken reasonable steps to cure any deficiencies in its performance;
3. Responding to any inquiries from FCC staff, petitions to deny, complaints, informal objections or other types of objections with respect to the License Renewal Application and/or the EEO Program Report; and
4. Filing any amendments or supplements to the License Renewal Application or EEO Program Report that may be required by the FCC or requested by the client.

The full terms of the representation will be governed by the Engagement Letter between the firm and the client. The Engagement Letter must be executed and the flat fee paid before representation may commence.

If you are interested in participating in Pillsbury's License Renewal Application Package, or have questions about it, please contact:

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