
FCC Announces Online Availability of New FCC Form 323 Ownership Report and Provides Interim Response to Concerns Regarding Use of Social Security Number

Today, the FCC released a Public Notice announcing that as of December 9, 2009, the new FCC Form 323 will become available online in the FCC's CDBS filing system.

Additionally, the FCC announced the availability of a "Special Use FRN" option in reporting attributable interest holders on the new FCC Form 323. The FCC stated that if a filer "is unable to obtain an FRN for any specific individual required to be reported on Form 323, the electronic form contains a mechanism for generating an interim 'Special Use FRN' solely for the purposes of completing the form." The Special Use FRN is only to be used in filing biennial ownership reports on FCC Form 323 and may not be used for any other purpose at the FCC. According to the Public Notice, this option should be used only when necessary and filers should use their "best efforts" to obtain FRNs from all attributable interest holders. The FCC indicates that those who take advantage of the Special Use FRN are still expected to later obtain a "fully compliant" FRN which must be used in all future biennial ownership report filings.

The Commission will hold an information session regarding the new form on December 9, 2009 at 2:00 pm EST. The session will also be available over the Internet at www.fcc.gov/live. Questions may be submitted in advance by e-mailing Form323@fcc.gov.

As previously reported, the FCC delayed the deadline by which all licensees of **commercial** broadcast stations must file an initial biennial Ownership Report on the new version of the form until **January 11, 2010**.

If you have any questions about the content of this advisory, please contact the Pillsbury attorney with whom you regularly work or the attorneys below.

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