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## Noncommercial Stations' Biennial Ownership Reports: Due October 1, 2009

by Richard R. Zaragoza and Christine A. Reilly

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*As we recently reported, the FCC has altered the schedule for the filing of Biennial Ownership Reports by commercial broadcast stations. Those Reports must now be filed by November 1, 2009 and by the same date every two years thereafter. However, the schedule for the filing of Biennial Ownership Reports for noncommercial broadcast stations remains unchanged.*

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Noncommercial radio stations licensed to communities in Alaska, American Samoa, Florida, Guam, Hawaii, Marianas Islands, Oregon, Puerto Rico, the Virgin Islands and Washington, and noncommercial television stations licensed to communities in Iowa and Missouri, must file their Biennial Ownership Reports by **October 1, 2009**.

As discussed in a Client Advisory sent earlier this month, the FCC released an Order on May 29, 2009, suspending the biennial ownership reporting requirement for licensees of **commercial** radio and television broadcast stations that would otherwise have been required to file their reports by June 1, August 1 or October 1, 2009. Accordingly, all commercial radio and television stations are currently scheduled to submit their biennial ownership reports by **November 1, 2009, and every odd numbered year by the same deadline**.

The above mentioned FCC Order included a Further Notice of Proposed Rulemaking seeking comments on, among other things, whether the Commission should adopt a similar uniform reporting deadline for all noncommercial radio and television broadcast stations. That proceeding remains pending. As a result, noncommercial radio and television stations are required to continue preparing and filing their biennial ownership reports every two years by the anniversary date of the station's license renewal filing.

Should there be any questions concerning this matter, please contact any of the attorneys in the Communications Group or the authors of this advisory.

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