
Biennial Ownership Reports: Filing Deadline Changes to Nov. 1, 2009 for All Radio and TV Stations Nationwide

by Richard R. Zaragoza and Christine A. Reilly

The FCC has altered the schedule for the filing of Biennial Ownership Reports by commercial broadcast stations. August 1, 2009 is no longer the deadline for commercial radio stations in California, North Carolina, and South Carolina, or for commercial television stations in Illinois and Wisconsin to file their biennial ownership reports. Those Reports must now be filed by November 1, 2009 and by the same date every two years thereafter, by all radio and television stations nationwide.

As previously reported, 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, commercial radio stations licensed to communities in California, North Carolina and South Carolina and commercial television stations licensed to communities in Illinois or Wisconsin need not file their Biennial Ownership Reports by August 1. They will, however, have to file their reports by November 1, 2009, as will the licensees of all other commercial, full-power AM, FM, TV, LPTV and Class A television stations licensed to communities in any State or Territory of the United States.

The FCC is in the process of modifying FCC Form 323 which is used by commercial broadcast station licensees to file their Biennial Ownership Reports. As of the date of this Advisory, that form has not been approved by OMB. The FCC has stated that if, for some reason, OMB does not approve the new FCC Form 323 by November 1, all filers that would have been required to file the form between by June 1, by August 1 or by October 1, 2009 will be required to file the now current form by November 1.

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