

FCC to Require Ownership Report Electronic Filing with License Renewal Applications

Stations First Affected Are Radio Stations in Arkansas, Louisiana and Mississippi That Are Filing License Renewal Applications by February 2, 2004

In an eleventh-hour *Public Notice* (DA 04-51) the FCC announced that it will require broadcasters to file ownership reports simultaneously with their license renewal applications, **beginning with radio stations licensed to communities in Arkansas, Louisiana and Mississippi, which must file by Monday, February 2, 2004.**

The Commission's current biennial ownership reporting scheme began in 1999, and required stations to make their ownership filings in every odd-numbered year thereafter, regardless of their license renewal filing due dates. However, the Commission has now determined that, for those stations with even-year renewal filing due dates, continuing to file biennial ownership reports only in odd-numbered years will violate the requirement in Section 73.3615(a) of the FCC Rules that ownership reports be filed at the same time as license renewal applications.

The *Public Notice* lists the stations that will be required to file an ownership report with their license renewal application in **2004** as follows:

Radio Stations

Arkansas
Colorado
Illinois
Indiana
Iowa
Kentucky
Louisiana
Michigan
Minnesota
Mississippi

Missouri
Montana
North Dakota
Ohio
South Dakota
Tennessee
Wisconsin

Television Stations

The District of Columbia
The Commonwealth of Puerto Rico
The Territory of the Virgin Islands
Alabama
Florida
Georgia
Maryland
North Carolina
South Carolina
Virginia
West Virginia

Thereafter, those stations will file their next biennial ownership reports in 2006, 2008, etc.

The *Public Notice* also lists the stations that will be required to file an ownership report with their license renewal application in **2006**, as follows:

Radio Stations

Delaware
Pennsylvania
New Jersey
New York

Television Stations

The Territory of American Samoa
The Territory of Guam
The Territory of Saipan
Alaska
Arizona
California
Connecticut
Hawaii
Idaho
Kansas
Maine
Massachusetts
Nebraska
Nevada
New Hampshire
New Mexico
Oklahoma
Oregon
Rhode Island
Texas
Utah
Vermont
Washington
Wyoming

Thereafter, those stations will file their biennial ownership reports in 2008, 2010, 2012, etc.

Neither of the “extra” filings in 2004 or 2006 will require the payment of filing fees. Filers should mark the “other” box for the type of filing for the 2004 and 2006 filings. Also, filers should remember that all ownership report filings must now be made electronically via the FCC’s Internet filing system.

For more information on the new filing requirement, as well as assistance in the preparation and filing of the ownership report, please contact any of the lawyers in the Communications Practice Group.

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