

October 1 Deadline Approaching for TV Stations' Must-Carry/Retransmission Consent Elections

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October 1, 2026 is the deadline for commercial TV stations to (1) upload to their online Public Inspection File their must-carry/retransmission consent carriage election statements for the three-year cycle covering January 1, 2027 to December 31, 2029, and (2) directly notify MVPDs of any changes to their carriage elections.

Under the FCC's electronic carriage election procedures, commercial TV stations must place statements electing either must-carry or retransmission consent in their Public Inspection File by October 1 every third year and retain the statement there throughout the three-year election cycle. A separate notice sent directly to an MVPD is only required when a station wishes to change from the carriage status it elected with respect to that MVPD for the prior three-year cycle. Television stations and satellite providers must maintain up-to-date contact information for carriage-related issues in their online Public Inspection File, and cable operators must do the same in the FCC's Cable Operations and Licensing System (COALS) database. If they have not already done so, stations and MVPDs should immediately check to confirm that the contact information currently listed in their Public Inspection File or COALS is accurate and up to date.

A station wishing to change from its current carriage election with respect to an MVPD must, in addition to uploading the new carriage election statement, send notice of that change directly to the MVPD's email address provided in the MVPD's Public Inspection File or COALS (and copy the FCC at ElectionNotices@FCC.gov). The station must also place a copy of the emailed election change notice in its Public Inspection File alongside the station's carriage election statement. MVPDs are required to confirm receipt of the change notice as soon as possible. If a station does not receive confirmation, it must follow up using the telephone number provided in the MVPD's Public Inspection File or COALS. A station that retains records demonstrating it took the required steps and timely uploaded its election materials to its Public Inspection File will be able to demonstrate that it complied with the FCC's election procedures.

Noncommercial educational ("NCE") television stations are not entitled to elect retransmission consent, so their process is slightly different. These stations are required to make an initial request for carriage, which most did back when the FCC's electronic election procedures took effect in 2020. Thereafter, NCE stations are required to maintain their carriage requests in their Public Inspection File. As a result, NCE stations do not make new triennial elections every three years, but should verify that their carriage-related information remains accurate and current in their Public Inspection File.

Separate procedures also apply to those Low Power TV stations that qualify for must-carry but which are not required to maintain a Public Inspection File. Qualified LPTV stations must provide an initial carriage election by email directly to MVPDs and thereafter provide a new email notice when changing their election for the upcoming three-year cycle. As with full-power commercial television stations, a qualified LPTV station must copy ElectionNotices@FCC.gov when making initial or change notifications to MVPDs. Because these stations do not have an online Public Inspection File, they must ensure that their contact information in the FCC's Licensing and Management System is up to date so that MVPDs can contact them with any carriage-related questions.

To avoid last-minute issues in meeting the October 1 deadline, commercial TV stations should review their carriage arrangements now, determine whether they will maintain or change them for the 2027-2029 cycle, and then place the appropriate election documentation in their Public Inspection File and send any required email notifications to ensure those are received by the October 1 deadline.

Stations that are planning to change their election with respect to an MVPD should also confirm the MVPD's listed contact information well in advance of the deadline to avoid last-minute issues, such as discovering that the FCC's Public Inspection File or COALS databases are offline for maintenance or other reasons, or that the MVPD's contact information is simply missing from those databases. This will ensure the station has sufficient time to determine and implement the best alternative approach should that be necessary.

Finally, after uploading these documents to the Public Inspection File, stations should take the added step of confirming that the uploaded documents are visible on the public-facing side of the Public Inspection File so it is clear that the station completed all steps by the October 1 deadline.