

Effective Immediately, FCC Requires FRN and Password to File Form 398, the Quarterly Children's Programming Report

by Lauren Lynch Flick and Scott R. Flick

FCC issues no advance Public Notice of new requirement.

After we published our Advisory reminding licensees of the deadline to electronically file the Quarterly Children's Television Programming Report on FCC Form 398 for the Third Quarter of 2010, the FCC disclosed that it has modified its electronic filing system to require the entry of a Federal Registration Number ("FRN") and password as the final step before the report can be filed. The FCC placed the following notice on its webpage dedicated to the Children's Television Act of 1990, although NOT on the page that licensees visit to prepare and file the report itself:

To enhance the security and integrity of the KidVid database, we now require authentication with an FRN and password associated with the broadcast facility for each Form 398 filing. After you have completed Form 398, you will be prompted to enter this information. You must enter your FRN and password to complete the form. If you have forgotten your FRN password, please contact the CORES helpdesk at 877-480-3201.

Because of the potential for surprises associated with the implementation of this new requirement, we recommend that, if possible, licensees complete their Form 398 filings in advance of the filing deadline. The filing deadline for this quarter falls on Tuesday, October 12, 2010 due to the Columbus Day holiday, so Friday, October 8, 2010 is a good target date for completing the Form 398. This will allow additional time for station personnel to address any issues that arise, such as determining which FRN and password combination(s) will be accepted by the filing system, and, if necessary, to locate the correct information.

Should you have any questions regarding this Alert or the FCC's children's programming requirements in general, please contact us.

Lauren Lynch Flick **(bio)**
Washington, DC
+1.202.663.8166
lauren.lynn.flick@pillsburylaw.com

Scott R. Flick **(bio)**
Washington, DC
+1.202.663.8167
scott.flick@pillsburylaw.com

This publication is issued periodically to keep Pillsbury Winthrop Shaw Pittman LLP clients and other interested parties informed of current legal developments that may affect or otherwise be of interest to them. The information contained herein does not constitute legal opinion and should not be regarded as a substitute for legal advice.

© 2010 Pillsbury Winthrop Shaw Pittman LLP. All Rights Reserved.