



Communications December 2015

2016 Broadcasters' Calendar

Items of Note in 2016

- Prohibition on Certain Communications: Beginning on the January 12, 2016 deadline to file applications to participate in the Broadcast Incentive Auction, all full-power and Class A television licensees that are or will become eligible to participate in the reverse auction will be subject to the FCC's rules prohibiting communications about bids and bidding strategies. This "quiet period" will continue until the FCC declares the Auction is over and announces the results of the Auction.
- II. Television Station Online Public Inspection File: The FCC adopted a requirement that full-power and Class A television stations post the contents of their public inspection file on the FCC's website, effective as of August 2, 2012. For such stations, all references herein to the public inspection file refer to the TV station's online public inspection file. The FCC is currently considering a Notice of Proposed Rulemaking which would expand the online public file requirement to include radio stations as well.
- III. Quarterly Issues/Programs Lists: The FCC previously adopted a new form, FCC Form 355, to replace the Quarterly Issues/Programs List for television stations. While that form was later rescinded before becoming effective, the FCC issued a Notice of Inquiry proposing a new FCC Form to replace the current issues/programs list. As of this publication, radio, television, and Class A television licensees must continue to prepare and place issues/programs lists in their public inspection files on a quarterly basis on the dates noted. Television broadcasters should be alert to a future announcement regarding the effective and due dates of the proposed new form. However, because the FCC must issue a Notice of Proposed Rulemaking prior to implementing any new rules, it will still be some time until a new reporting form is adopted by the FCC.
- IV. Broadcast Annual Employment Report on FCC Form 395-B: The FCC suspended use of this form in 2001 in connection with the revision of its EEO Rule. In 2004, the FCC announced that it would resume use of the form and would advise the broadcast industry of the due date for the first filing of the reinstated form. As of the date of this publication, no such announcement has been made. Broadcasters should be alert to a future announcement regarding the possible reinstatement of this filing requirement. While the Form 395-B is currently suspended, other important EEO outreach and reporting obligations remain in effect, and their 2016 deadline dates are noted in this Calendar.
- V. Applications for Renewal of License: The three-year long license renewal cycle for broadcast stations in television services (television, Class A, LPTV, TV Translator), which began on June 1, 2012, ended in 2015 and will not begin again until June 1, 2020. The renewal cycle for radio

services (AM, FM, FM Translator, LPFM), which ended in 2014, will not begin again until June 1, 2019.

Disclaimer

The following deadlines are based on information known by us as of the date hereof. These deadlines may or may not apply to any particular broadcaster. These deadlines are provided for general informational purposes only and should be double-checked for currency close to each pertinent date/deadline. Actions by the FCC, Congress, or the courts could affect any of these deadlines by, for example, eliminating a particular reporting/filing obligation altogether or modifying the form used, content, deadline, fee, or manner of reporting/filing. It should also be noted that, as a general rule, when a deadline for filing a document with the FCC falls on a weekend or a federal holiday, the filing deadline will shift to the next business day. The listing of deadlines below is not intended to be complete or exhaustive of all regulatory and non-regulatory deadlines that may apply to a given broadcaster year-to-year. Accordingly, broadcasters should seek the advice of communications counsel in each instance to assure timely and proper filing. This edition of our annual "Broadcasters' Calendar" supersedes all prior editions and accordingly any prior editions should no longer be used.

January 1

Closed Captioning of Internet Video Clips—Beginning on this date, Internet video clips that contain a single excerpt of a captioned television program with the same video and audio that was shown on television (i.e., "straight lift" clips) must be captioned if the associated programming was shown on television in the United States with captions.

January 10

Quarterly Issues/Programs List Required—All full-power radio, full-power television, and Class A television stations must place in their public inspection files by this date the Quarterly Issues/Programs List covering the period October 1, 2015 through December 31, 2015.

Certification of Children's Commercial Time Limitations Required—Commercial full-power and Class A television stations must place in their public inspection files by this date records "sufficient to verify compliance" with the FCC's commercial time limitations in children's programming broadcast during the period October 1, 2015 through December 31, 2015.

FCC Form 398 Children's Programming Report Due—Commercial full-power and Class A television stations must by this date electronically file FCC Form 398 demonstrating their responsiveness to "the educational and informational needs of children" for the period October 1, 2015 through December 31, 2015, and ensure a copy of the form as filed with the FCC is in the station's public inspection file. *Note that because this filing deadline falls on a weekend, the submission of this item to the FCC may be made on January 11.*

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their public inspection files sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period October 1, 2015 through December 31, 2015 and place it in their public inspection files.

January 12

FCC Form 177 Incentive Auction Application Due—All full-power and Class A television station licensees seeking to relinquish spectrum usage rights in the Incentive Auction must electronically file an FCC Form 177 auction application via the FCC's Auction System prior to 6:00 p.m. Eastern on this date.

January 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and online simulcasters must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending November 30, 2015.

January 29

First Filing Window Opens for AM Translator Modification Applications—Beginning on this date, Class C and Class D AM station licensees may file minor modification applications with the FCC to relocate FM translators up to 250 miles for use in rebroadcasting AM stations. The first filing window will close at 11:59 p.m. Eastern on July 28, 2016.

January 31

Copyright Royalty Fee: Annual Minimum Fee Statement of Account Form Due—By this date, most commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must submit the Minimum Fee Statement of Account Form and the annual copyright royalty fee to SoundExchange. January 31 is also the date by which certain webcasters and simulcasters are eligible to make elections affecting their royalty rates and reporting requirements for the upcoming year. If your radio broadcast station is simulcast or rebroadcast over the Internet, we encourage you to consult qualified counsel with regard to your obligations.

February 1

Annual EEO Public File Report Required—Station Employment Units that have five or more full-time employees and are comprised of radio and/or television stations licensed to communities in Arkansas, Kansas, Louisiana, Mississippi, Nebraska, New Jersey, New York, or Oklahoma must by this date place in their public inspection files and post on their station websites a report regarding station compliance with the FCC's EEO Rule during the period February 1, 2015 through January 31, 2016. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our most recent EEO Advisory.

FCC Form 397 Mid-Term EEO Report Due—Radio Station Employment Units that have eleven or more full-time employees and are comprised of radio stations licensed to communities in Arkansas, Louisiana, or Mississippi, must by this date electronically file with the FCC and place in their public inspection files the Mid-Term EEO Report on FCC Form 397. The Station Employment Unit's last two EEO Public File Reports must be submitted with the Form 397. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our most recent EEO Advisory.

FCC Form 323-E Biennial Ownership Report Due—Noncommercial radio stations licensed to communities in Arkansas, Louisiana, Mississippi, New Jersey, and New York, and noncommercial television stations licensed to communities in Kansas, Nebraska, and Oklahoma (other than sole proprietorships or partnerships composed entirely of natural persons) must electronically file by this date their biennial ownership reports on FCC Form 323-E, unless they have consolidated this filing date with that of other commonly owned stations licensed to communities in other states. FCC Form 323-E does not require a filing fee. The form as filed must be placed in stations' public inspection files.

February 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must by this date submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending December 31, 2015.

March 16

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must by this date submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending January 31, 2016.

March 29

Incentive Auction Initial Relinquishment Option Commitment Deadline—All full-power and Class A television licensees that timely submitted complete FCC Form 177 applications to participate in the Incentive Auction must by this date commit to an initial relinquishment option. Licensees that fail to make an initial bid commitment by March 29, 2016 will not be eligible to participate in the Auction.

April 1

Annual EEO Public File Report Required—Station Employment Units that have five or more full-time employees and are comprised of radio and/or television stations licensed to communities in Delaware, Indiana, Kentucky, Pennsylvania, Tennessee, or Texas must by this date place in their public inspection files and post on their station websites a report regarding station compliance with the FCC's EEO Rule during the period April 1, 2015 through March 31, 2016. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our most recent EEO Advisory.

FCC Form 397 Mid-Term EEO Report Due—Radio Station Employment Units that have eleven or more full-time employees and are comprised of radio stations licensed to communities in Indiana, Kentucky, or Tennessee, must by this date electronically file with the FCC and place in their public inspection files the Mid-Term EEO Report on FCC Form 397. The Station Employment Unit's last two EEO Public File Reports must be submitted with the Form 397. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our most recent EEO Advisory.

FCC Form 323-E Biennial Ownership Report Due—Noncommercial radio stations licensed to communities in Delaware, Indiana, Kentucky, Pennsylvania, or Tennessee and noncommercial television stations licensed to communities in Texas (other than sole proprietorships or partnerships composed entirely of natural persons) must electronically file by this date their biennial ownership reports on FCC Form 323-E, unless they have consolidated this filing date with that of other commonly owned stations licensed to communities in other states. FCC Form 323-E does not require a filing fee. The form as filed must be placed in stations' public inspection files.

April 10

Quarterly Issues/Programs List Required—All full-power radio, full-power television, and Class A television stations must place in their public inspection files by this date the Quarterly Issues/Programs List covering the period January 1, 2016 through March 31, 2016.

Certification of Children's Commercial Time Limitations Required—Commercial full-power and Class A television stations must place in their public inspection files by this date records "sufficient to verify compliance" with the FCC's commercial time limitations in children's programming broadcast during the period January 1, 2016 through March 31, 2016.

FCC Form 398 Children's Programming Report Due—Commercial full-power and Class A television stations must by this date electronically file FCC Form 398 demonstrating their responsiveness to "the educational and informational needs of children" for the period January 1, 2016 through March 31, 2016, and ensure a copy of the form as filed with the FCC is in the station's public inspection file. Note that because this filing deadline falls on a weekend, the submission of this item to the FCC may be made on April 11.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their public inspection files sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period January 1, 2016 through March 31, 2016 and place it in their public inspection files.

April 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must by this date submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending February 29, 2016.

May 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must submit by this date the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending March 31, 2016.

June 1

Annual EEO Public File Report Required—Station Employment Units that have five or more full-time employees and are comprised of radio and/or television stations licensed to communities in Arizona, the District of Columbia, Idaho, Maryland, Michigan, Nevada, New Mexico, Ohio, Utah, Virginia, West Virginia or Wyoming must by this date place in their public inspection files and post on their station websites a report regarding station compliance with the FCC's EEO Rule during the period June 1, 2015 through May 31, 2016. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our most recent EEO Advisory.

FCC Form 397 Mid-Term EEO Report Due—Radio Station Employment Units that have eleven or more full-time employees and are comprised of radio stations licensed to communities in Michigan and Ohio, and Television Station Employment Units that have five or more full-time employees and are comprised of television stations licensed to communities in the District of Columbia, Maryland, Virginia, or West Virginia, must by this date electronically file with the FCC and place in their public inspection files the Mid-Term EEO Report on FCC Form 397. The Station Employment Unit's last two EEO Public File Reports must be submitted with the Form 397. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our most recent EEO Advisory.

FCC Form 323-E Biennial Ownership Report Due—Noncommercial radio stations licensed to communities in Michigan or Ohio and noncommercial television stations licensed to communities in Arizona, the District of Columbia, Idaho, Maryland, Nevada, New Mexico, Utah, Virginia, West Virginia, or Wyoming (other than sole proprietorships or partnerships composed entirely of natural persons) must electronically file by this date their biennial ownership reports on FCC Form 323-E, unless they have consolidated this filing date with that of other commonly owned stations licensed to communities in other states. FCC Form 323-E does not require a filing fee. The form as filed must be placed in stations' public inspection files.

June 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must by this date submit to SoundExchange the Monthly Report of Use and Monthly Usage Statement of Account forms for the month ending April 30, 2016.

July

Regulatory Fees Announced—The FCC is expected to release a Public Notice this month indicating the date by which annual regulatory fees must be filed with the FCC and the amounts of those fees. Broadcasters should remain alert for this announcement.

July 10

Quarterly Issues/Programs List Required—All full-power radio, full-power television, and Class A television stations must place in their public inspection files by this date the Quarterly Issues/Programs List covering the period April 1, 2016 through June 30, 2016.

FCC Form 398 Children's Programming Report Due—Commercial full-power and Class A television stations must by this date electronically file FCC Form 398, demonstrating their responsiveness to "the

educational and informational needs of children" for the period April 1, 2016 through June 30, 2016, and ensure a copy of the form as filed with the FCC is in the station's public inspection file. **Note that because** this filing deadline falls on a weekend, the submission of this item to the FCC may be made on July 11.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their public inspection files sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period April 1, 2016 through June 30, 2016 and place it in their public inspection files.

July 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must by this date submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending May 31, 2016.

July 29

Second Filing Window Opens for AM Translator Modification Applications—Beginning on this date, all AM station licensees that did not participate in the first modification filing window may file minor modification applications with the FCC to relocate FM translators up to 250 miles for use in rebroadcasting AM stations. The second filing window will close at 5:59 p.m. Eastern on October 31, 2016.

July 31

Copyright Royalty Claims Due—Television stations with locally-produced programming whose signals were carried as distant signals by at least one cable or satellite system in 2015 are eligible to file royalty claims for compensation with the Copyright Office in Washington, DC by this date. Under the federal Copyright Act, cable systems and satellite operators must pay "compulsory license" royalties to carry distant TV signals on their systems. The royalties are used to compensate the owners of copyrighted works broadcast on those signals. Stations that do not file claims by the deadline will not be able to collect royalties for carriage of their signals during 2015.

August 1

Annual EEO Public File Report Required—Station Employment Units that have five or more full-time employees and are comprised of radio and/or television stations licensed to communities in California, Illinois, North Carolina, South Carolina, or Wisconsin must by this date place in their public inspection files and post on their station websites a report regarding station compliance with the FCC's EEO Rule during the period August 1, 2015 through July 31, 2016. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our most recent EEO Advisory.

FCC Form 397 Mid-Term EEO Report Due—Radio Station Employment Units that have eleven or more full-time employees and are comprised of radio stations licensed to communities in Illinois and Wisconsin, and Television Station Employment Units that have five or more full-time employees

and are comprised of television stations licensed to communities in **North Carolina and South Carolina**, must by this date electronically file with the FCC and place in their public inspection files the Mid-Term EEO Report on FCC Form 397. The Station Employment Unit's last two EEO Public File Reports must be submitted with the Form 397. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our most recent EEO Advisory.

FCC Form 323-E Biennial Ownership Report Due—Noncommercial radio stations licensed to communities in Illinois or Wisconsin and noncommercial television stations licensed to communities in California, North Carolina or South Carolina (other than sole proprietorships or partnerships composed entirely of natural persons) must electronically file by this date their biennial ownership reports on FCC Form 323-E, unless they have consolidated this filing date with that of other commonly owned stations licensed to communities in other states. FCC Form 323-E does not require a filing fee. The form as filed must be placed in stations' public inspection files.

August 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must by this date submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending June 30, 2016.

September 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must by this date submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending July 31, 2016.

September 30

EEO 1 Report Due—Broadcasters that are subject to the federal Equal Employment Opportunity Commission's (EEOC) reporting requirements must file their EEO 1 Report (Form 100) by this date. We encourage you to consult with counsel on the filing and visit http://www.eeoc.gov/employers/eeo1survey/.

October 1

Annual EEO Public File Report Required—Station Employment Units that have five or more full-time employees and are comprised of radio and/or television stations licensed to communities in Alaska, American Samoa, Florida, Guam, Hawaii, Iowa, the Mariana Islands, Missouri, Oregon, Puerto Rico, Saipan, the Virgin Islands or Washington must by this date place in their public inspection files and post on their station websites a report regarding station compliance with the FCC's EEO Rule during the period October 1, 2015 through September 30, 2016. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our most recent EEO Advisory.

FCC Form 397 Mid-Term EEO Report Due—Radio Station Employment Units that have eleven or more full-time employees and are comprised of radio stations licensed to communities in Iowa and Missouri, and Television Station Employment Units that have five or more full-time employees and

are comprised of television stations licensed to communities in the **Florida**, **Puerto Rico**, **and the Virgin Islands**, must by this date electronically file with the FCC and place in their public inspection files the Mid-Term EEO Report on FCC Form 397. The Station Employment Unit's last two EEO Public File Reports must be submitted with the Form 397. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our most recent EEO Advisory.

FCC Form 323-E Biennial Ownership Report Due—Noncommercial radio stations licensed to communities in Iowa or Missouri and noncommercial television stations licensed to communities in Alaska, American Samoa, Florida, Guam, Hawaii, the Mariana Islands, Oregon, Puerto Rico, Saipan, the Virgin Islands, or Washington (other than sole proprietorships or partnerships composed entirely of natural persons) must electronically file by this date their biennial ownership reports on FCC Form 323-E, unless they have consolidated this filing date with that of other commonly owned stations licensed to communities in other states. FCC Form 323-E does not require a filing fee. The form as filed must be placed in stations' public inspection files.

October 10

Quarterly Issues/Programs List Required—All full-power radio, full-power television, and Class A television stations must place in their public inspection files by this date the Quarterly Issues/Programs List covering the period July 1, 2016 through September 30, 2016.

Certification of Children's Commercial Time Limitations Required—Commercial full-power and Class A television stations must place in their public inspection files by this date records "sufficient to verify compliance" with the FCC's commercial time limitations in children's programming broadcast during the period July 1, 2016 through September 30, 2016.

FCC Form 398 Children's Programming Report Due—Commercial full-power and Class A television stations must by this date electronically file FCC Form 398, demonstrating their responsiveness to "the educational and informational needs of children" for the period July 1, 2016 through September 30, 2016, and ensure a copy of the form as filed with the FCC is in the station's public inspection file.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their public inspection files sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period July 1, 2016 through September 30, 2016 and place it in their public inspection files.

October 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must by this date submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending August 31, 2016.

November 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms

Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the

Internet must by this date submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending September 30, 2016.

December 1

Annual EEO Public File Report Required—Station Employment Units that have five or more full-time employees and are comprised of radio and/or television stations licensed to communities in Alabama, Colorado, Connecticut, Georgia, Maine, Massachusetts, Minnesota, Montana, New Hampshire, North Dakota, Rhode Island, South Dakota, or Vermont must by this date place in their public inspection files and post on their station websites a report regarding station compliance with the FCC's EEO Rule during the period December 1, 2015 through November 30, 2016. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our most recent EEO Advisory.

FCC Form 397 Mid-Term EEO Report Due—Radio Station Employment Units that have eleven or more full-time employees and are comprised of radio stations licensed to communities in Colorado, Minnesota, Montana, North Dakota, and South Dakota, and Television Station Employment Units that have five or more full-time employees and are comprised of television stations licensed to communities in Alabama and Georgia, must by this date electronically file with the FCC and place in their public inspection files the Mid-Term EEO Report on FCC Form 397. The Station Employment Unit's last two EEO Public File Reports must be submitted with the Form 397. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our most recent EEO Advisory.

FCC Form 323-E Biennial Ownership Report Due—Noncommercial radio stations licensed to communities in Colorado, Minnesota, Montana, North Dakota, or South Dakota, and noncommercial television stations licensed to communities in Alabama, Connecticut, Georgia, Maine, Massachusetts, New Hampshire, Rhode Island, or Vermont (other than sole proprietorships or partnerships composed entirely of natural persons) must electronically file by this date their biennial ownership reports on FCC Form 323-E, unless they have consolidated this filing date with that of other commonly owned stations licensed to communities in other states. FCC Form 323-E does not require a filing fee. The form as filed must be placed in stations' public inspection files.

FCC Form 2100, Schedule G, Annual DTV Ancillary/Supplementary Services Report Due—Commercial television, digital Class A television, and digital LPTV stations must by this date electronically file FCC Form 2100, Schedule G, the Annual DTV Ancillary/Supplementary Services Report for Commercial Digital Television Stations, with the FCC whether or not they have received any income from transmitting ancillary or supplementary services. If a digital station provided ancillary or supplementary services during the 12-month time period ending on the preceding September 30, and received compensation for doing so, the station is required to pay to the FCC five percent of the gross revenue from such services concurrently with the filling of Form 2100, Schedule G.

December 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those simulcasting radio programming over the Internet must by this date submit the Monthly Report of Use and Monthly Usage Statement of Account forms to SoundExchange for the month ending October 31, 2016.

For further information about this Advisory, please contact any of the following attorneys in the Communications Practice Group.

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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 comments contained herein do not constitute legal opinion and should not be regarded as a substitute for legal advice.

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