Advisory



Communications December 2020

2021 Broadcasters' Calendar

Items of Note in 20211

- I. Commercial and Noncommercial Biennial Ownership Report. December 1, 2021 is the deadline by which all commercial and noncommercial radio and television stations must file their biennial ownership reports. Commercial stations will file FCC Form 2100, Schedule 323, and noncommercial stations will file FCC Form 2100, Schedule 323-E. While these licensees may have filed a biennial report as recently as January 2020, that report fulfilled the reporting obligation for the period that ended on October 1, 2019. The deadline was extended from December 1, 2019 to January 31, 2020 to account for the delayed opening of the 2019 filing window in the FCC's Licensing and Management System. The new filing window opens October 1, 2021, and the information in all ownership reports must be accurate as of that date.
- II. Applications for Renewal of License: The three-year long state-by-state license renewal cycle continues for stations in the television services (full-power television, Class A, TV Translator, and LPTV) and radio services (AM, FM, FM Translator, and LPFM). Stations will file their license renewal applications on FCC Form 2100, Schedule 303-S ("Form 303-S") along with their Equal Opportunity Employment Reports on Form 2100, Schedule 396 ("Form 396"). The date by which the licensee must file a station's application for license renewal depends on the state or territory of the station's community of license. All licensees should familiarize themselves now with the dates associated with this important filing.
- III. License Renewal Local Public Notice Requirements: The FCC has modified its rules regarding the local public notice required for certain broadcast applications. With regard to license renewal applications, such modifications include replacing newspaper publication with an online notice, providing broadcasters with more flexibility with respect to when on-air announcements must air,

¹ The deadlines in the **2021 Broadcasters' Calendar** are based on information known as of the date hereof and may or may not apply to any particular broadcaster. They 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 shifts to the next business day. The listing 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 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.

and standardizing the text of on-air announcements. Of particular note, rather than requiring post-filing license renewal announcements to be broadcast on the first and sixteenth of each month, under the new rules, licensees must air six total announcements over four consecutive weeks, beginning within five business days after the FCC has "accepted for filing" their license renewal application. All licensees should familiarize themselves with the modified local public notice requirements, including the dates by which announcements must air and/or be posted online, which applications are subject to the online notice requirement, and how to satisfy the online notice requirement. Additional information can be found in our License Renewal Advisories published on Comm Law Center prior to the state-by-state application deadlines.

- IV. License Renewal Pre-Filing Announcements Eliminated: The FCC has eliminated the pre-filing announcement obligation for broadcast station license renewal applications. As a result, stations are no longer required to air pre-filing announcements during the two months preceding the filing of their license renewal application.
- V. Certifications of Compliance with Children's Television Commercial Limits and Children's Television Programming Reports: January 30, 2021 is the deadline for each full-power and Class A television station to upload its annual certification of compliance with commercial limits to its Public Inspection Files and to file via the FCC's Licensing and Management System its Children's Television Programming Report (Form 2100, Schedule H) covering calendar year 2020. Full-power and Class A television stations are no longer required to prepare their commercial limits certifications and Children's Television Programming Reports on a quarterly basis, and instead must do so annually.
- VI. TV Spectrum Repack Filing Deadlines: Full-power and Class A television stations transitioning to new channels in the spectrum repack were assigned to one of ten successive transition phases, each with its own timeline governing when stations may begin testing on their new channels and when they must cease operations on their pre-auction channels. July 13, 2020 marked the end of the 39-month post-auction transition period for full-power and Class A television stations assigned to new channels. As a result, any such station that has not received an extension of time and any other special temporary authority that might be required must have ceased operations on its preauction channel and completed its repack transition by that date. Because the 39-month postauction transition period has ended, the post-repack Transition Progress Report (FCC Form 2100, Schedule 387) filing deadlines are not noted in this year's calendar. However, stations that have received an extension of time to complete their transition must continue to file Transition Progress Reports on a quarterly basis until they have ceased operating on their pre-repack channels, completed construction of their post-repack facilities, and reported that information to the FCC. In addition to these quarterly reports, transitioning stations must file Transition Progress Reports ten weeks before the end of their assigned construction deadline, ten days after completion of all work related to constructing their post-repack facilities, and five days after ceasing operations on their pre-auction channel.
- VII. Noncommercial Educational FM Station Application Filing Window: The FCC has announced plans to open a filing window in 2021 for new noncommercial FM station applications. The filing window dates have not yet been set, but those interested in filing an application should monitor Comm Law Center for more information on the upcoming deadlines.
- VIII. Construction Permit Deadline Waivers for Certain FM Translator Stations: The FCC has announced that it will grant requests to waive construction permit deadlines expiring on or before

June 30, 2021 for FM translator permits awarded in Auctions 99 and 100 that have been impacted by construction delays and other challenges associated with the COVID-19 pandemic. Stations interested in seeking a waiver of their construction permit deadline should identify the permit expiration date and submit a waiver request no later than 15 days prior to that date.

IX. LPTV and TV Translator Digital Transition: LPTV and TV translator stations must complete construction of their digital facilities and cease all analog operations by July 13, 2021. Stations experiencing construction delays may seek one last extension of time and must do so by March 13, 2021.

January 10

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must upload to their Public Inspection File by this date the Quarterly Issues/Programs List covering the period October 1, 2020 through December 31, 2020.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their Public Inspection File 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, 2020 through December 31, 2020 and upload it to their Public Inspection File.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period October 1, 2020 through December 31, 2020 and upload it to their Public Inspection File by this date.

January 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending November 30, 2020 by this date.

January 30

Annual Children's Television Programming Report Due—Commercial full-power and Class A television stations must by this date file FCC Form 2100, Schedule H (formerly FCC Form 398) demonstrating their responsiveness to "the educational and informational needs of children" during the calendar year 2020. See Item of Note IV above for additional information. Note that because this filing deadline falls on a weekend, submission of this item to the FCC may be made on February 1.

Annual Certification of Children's Commercial Time Limitations Due—Commercial full-power and Class A television stations must upload to their Public Inspection File by this date records "sufficient to verify compliance" with the FCC's commercial limitations in children's programming broadcast during the calendar year 2020. See Item of Note IV above for additional information.

February 1

Filing of Applications for Renewal of License for Radio and Television Stations—Full-power AM and FM radio stations, as well as LPFM and FM Translator stations, licensed to communities in Kansas, Nebraska, or Oklahoma, and full-power television, Class A, LPTV, and TV Translator

stations licensed to communities in Arkansas, Louisiana, or Mississippi, must file by this date their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396, and commercial stations must promptly submit to the FCC the renewal application filing fee.

Post-Filing Announcements for Radio and Television Stations—Full-power AM and FM radio stations, as well as LPFM stations, licensed to communities in Kansas, Nebraska, or Oklahoma, and full-power television and Class A stations, as well as LPTV stations capable of local origination, licensed to communities in Arkansas, Louisiana, or Mississippi, must begin to air post-filing announcements within five business days after the FCC has "accepted for filing" their license renewal application. FM Translator and TV Translator stations, as well as LPTV stations not capable of local origination, must arrange for the required online public notice of their license renewal application filing. See Item of Note II above for additional information.

Annual EEO Public File Report Due—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 upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period February 1, 2020 through January 31, 2021. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our EEO Advisory.

Copyright Royalty Fee: Annual Minimum Fee Statement of Account Form Due—By this date, most commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must submit the Minimum Fee Statement of Account Form and the annual copyright royalty fee to SoundExchange. February 1 is also the date by which non-commercial educational webcasters, such as student-run noncommercial educational stations simulcasting their programming over the Internet, may elect to pay a \$100 fee to obtain a waiver of certain reporting requirements for the upcoming calendar year. If your radio station is simulcast or rebroadcast over the Internet, we encourage you to consult qualified counsel with regard to your obligations.

February 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending December 31, 2020 by this date.

March 1

EEO 1 Report—Broadcasters that are subject to the federal Equal Employment Opportunity Commission's (EEOC) reporting requirements must file their EEO 1 Report (Form 100) annually. The EEOC has announced that it expects to begin collecting the 2020 EEO 1 Reports in March 2021. Private employers that have 100 or more employees at a single establishment or collectively have 100 or more employees at multiple establishments, as well as certain federal contractors, are generally subject to this requirement and must complete the report based on employment data from a single pay period during October, November, or December 2020. We encourage you to consult with counsel on the filing and visit https://www.eeoc.gov/employers/eeo-reports-surveys for additional background. Note that, due to the COVID-19 pandemic, the EEOC delayed the deadline for filing the 2019 EEO 1 survey to 2021. The new deadline for the 2019 and 2020 EEO 1 Report will be announced on the EEOC's website.

March 13

LPTV and TV Translator Station Construction Permit Extension Requests Due—LPTV and TV translator stations that have experienced delays in completing construction of their new digital facilities may by this date request one last extension of their construction permits prior to the July 13, 2021 digital transition deadline. See Item of Note VIII above for additional information.

March 17

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending January 31, 2021 by this date.

April 1

Filing of Applications for Renewal of License for Radio and Television Stations—Full-power AM and FM radio stations, as well as LPFM and FM Translator stations, licensed to communities in Texas, and full-power television, Class A, LPTV, and TV Translator stations licensed to communities in Indiana, Kentucky, and Tennessee, must file by this date their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396, and commercial stations must promptly submit their FCC license renewal application filing fee.

Post-Filing Announcements for Radio and Television Stations—Full-power AM and FM radio stations, as well as LPFM stations, licensed to communities in Texas, and full-power television and Class A stations, as well as LPTV stations capable of local origination, licensed to communities in Indiana, Kentucky, and Tennessee, must begin to air post-filing announcements within five business days after the FCC has "accepted for filing" their license renewal application. FM Translator and TV Translator stations, as well as LPTV stations not capable of local origination, must arrange for the required online public notice of their license renewal application filing. See Item of Note II above for additional information.

Annual EEO Public File Report Due—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 upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period April 1, 2020 through March 31, 2021. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our <u>EEO Advisory</u>.

April 10

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must upload to their Public Inspection File by this date the Quarterly Issues/Programs List covering the period January 1, 2021 through March 31, 2021.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their Public Inspection File 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, 2021 through March 31, 2021 and upload it to their Public Inspection File.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period January 1, 2021 through March 31, 2021 and upload it to their Public Inspection File by this date.

April 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending February 28, 2021 by this date.

May 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending March 31, 2021 by this date.

June 1

Filing of Applications for Renewal of License for Radio and Television Stations—Full-power AM and FM radio stations, as well as LPFM and FM Translator stations, licensed to communities in Arizona, Idaho, Nevada, New Mexico, Utah, and Wyoming, and full-power television, Class A, LPTV, and TV Translator stations licensed to communities in Michigan and Ohio, must file by this date their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396, and commercial stations must promptly submit their FCC license renewal application filing fee.

Post-Filing Announcements for Radio and Television Stations—Full-power AM and FM radio stations, as well as LPFM stations, licensed to communities in Arizona, Idaho, Nevada, New Mexico, Utah, and Wyoming, and full-power television stations and Class A stations, as well as LPTV stations capable of local origination, licensed to communities in the Michigan and Ohio, must begin to air post-filing announcements within five business days after the FCC has "accepted for filing" their license renewal application. FM Translator and TV Translator stations, as well as LPTV stations not capable of local origination, must arrange for the required online public notice of their license renewal application filing. See Item of Note II above for additional information.

Annual EEO Public File Report Due—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 upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period June 1, 2020 through May 31, 2021. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our <u>EEO Advisory</u>.

June 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending April 30, 2021 by this date.

July 10

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must upload to their Public Inspection File by this date the Quarterly Issues/Programs Lists covering the period April 1, 2021 through June 30, 2021.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their Public Inspection File 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, 2021 through June 30, 2021 and upload it to their Public Inspection File.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period April 1, 2021 through June 30, 2021 and upload it to their Public Inspection File by this date.

July 13

LPTV and **TV** Translator Station Digital Transition Date—LPTV and **TV** Translator stations must by this date complete their transition to digital facilities and cease all analog operations. Any LPTV stations that have not completed construction of their new digital facility by this date must remain silent until construction is complete. See Item of Note VIII above for additional information.

July 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending May 31, 2021 by this date.

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 2020 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 this deadline will not be able to collect royalties for distant carriage of their signals during 2020.

August 1

Filing of Applications for Renewal of License for Radio and Television Stations—Full-power AM and FM radio stations, as well as LPFM and FM Translator stations, licensed to communities in California, and full-power television, Class A, LPTV, and TV Translator stations licensed to communities in Illinois and Wisconsin, must file by this date their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396, and commercial stations must promptly submit their FCC license renewal application filing fee. Note that because this filing deadline falls on a weekend, submission of this item to the FCC may be made on August 2.

Post-Filing Announcements for Radio and Television Stations—Full-power AM and FM radio stations, as well as LPFM stations, licensed to communities in California, and full-power television stations and Class A stations, as well as LPTV stations capable of local origination, licensed to communities in Illinois and Wisconsin, must begin to air post-filing announcements within five business days after the FCC has "accepted for filing" their license renewal application. FM Translator and TV Translator stations, as well as LPTV stations not capable of local origination, must arrange for the required online public notice of their license renewal application filing. See Item of Note II above for additional information.

Annual EEO Public File Report Due—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 upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period August 1, 2020 through July 31, 2021. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our <u>EEO Advisory</u>.

August 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending June 30, 2021 by this date.

September 1

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 and the amounts of those fees. Broadcasters should watch for this announcement.

September 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending July 31, 2021 by this date.

October 1

Filing of Applications for Renewal of License for Radio and Television Stations—Full-power AM and FM radio stations, as well as LPFM and FM Translator stations, licensed to communities in Alaska, American Samoa, Guam, Hawaii, Mariana Islands, Oregon, and Washington, and full-power television, Class A, LPTV, and TV Translator stations licensed to communities in Iowa and Missouri, must file by this date their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396, and commercial stations must promptly submit their FCC license renewal application filing fee.

Post-Filing Announcements for Radio and Television Stations—Full-power AM and FM radio stations, as well as LPFM stations, licensed to communities in Alaska, American Samoa, Guam, Hawaii, Mariana Islands, Oregon, and Washington, and full-power television stations and Class A stations, as well as LPTV stations capable of local origination, licensed to communities in lowa and Missouri, must begin to air post-filing announcements within five business days after the FCC has "accepted for filing" their license renewal application. FM Translator and TV Translator stations, as well

as **LPTV stations not capable of local origination**, must arrange for the required online public notice of their license renewal application filing. See *Item of Note II above for additional information*.

Annual EEO Public File Report Due—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, the Virgin Islands, or Washington must by this date upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period October 1, 2020 through September 30, 2021. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our <u>EEO Advisory</u>.

October 10

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must upload to their Public Inspection File by this date the Quarterly Issues/Programs List covering the period July 1, 2021 through September 30, 2021.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their Public Inspection File 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, 2021 through September 30, 2021 and upload it to their Public Inspection File.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period July 1, 2021 through September 30, 2021 and upload it to their Public Inspection File by this date.

October 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending August 31, 2021 by this date.

November 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending September 30, 2021 by this date.

December 1

Filing of Applications for Renewal of License for Radio and Television Stations—Full-power AM and FM radio stations, as well as LPFM and FM Translator stations, licensed to communities in Connecticut, Massachusetts, Maine, New Hampshire, Vermont, and Rhode Island, and full-power television, LPTV and TV Translator stations licensed to communities in Colorado, Minnesota, Montana, North Dakota, and South Dakota, must file by this date their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396, and commercial stations must promptly submit their FCC license renewal application filing fee.

Post-Filing Announcements for Radio and Television Stations—Full-power AM and FM radio stations, as well as LPFM stations, licensed to communities in Connecticut, Massachusetts, Maine, New Hampshire, Vermont, and Rhode Island, and full-power television stations and Class A stations, as well as LPTV stations capable of local origination, licensed to communities in Colorado, Minnesota, Montana, North Dakota, and South Dakota, must begin to air post-filing announcements within five business days after the FCC has "accepted for filing" their license renewal application. FM Translator and TV Translator stations, as well as LPTV stations not capable of local origination, must arrange for the required online public notice of their license renewal application filing. See Item of Note II above for additional information.

Annual EEO Public File Report Due—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 upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period December 1, 2020 through November 30, 2021. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our <u>EEO</u> Advisory.

Commercial and Noncommercial Biennial Ownership Reports Due—Commercial stations are required to file FCC Form 2100, Schedule 323 (Ownership Report for Commercial Broadcast Stations) and noncommercial stations must file the FCC Form 2100, Schedule 323-E (Ownership Report for Noncommercial Broadcast Stations) by this date. All reports must be accurate as of October 1, 2021. In cases where a broadcast station is sold between October 1, 2021 and the filing date, a biennial ownership report must be filed by the party that owned the station as of October 1, 2021.

FCC Form 2100, Schedule G, Annual DTV Ancillary/Supplementary Services Report Due—Commercial television, digital Class A television, and digital LPTV stations that provided feeable ancillary or supplementary services during the 12-month period ending on September 30, 2021 must by this date file FCC Form 2100, Schedule G with the FCC. Concurrent with its filing, the station is required to pay to the FCC five percent of the gross revenue derived from such services.

December 15

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

Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their

programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account
forms with SoundExchange for the month ending October 31, 2021 by this date.

December 31

Pillsbury's 2022 Broadcasters' Calendar—By this date, broadcast stations in all states should ensure they have obtained a copy of Pillsbury's *2022 Broadcasters' Calendar*, and be prepared for another year packed with regulatory deadlines.

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

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