

December 1, 2021 Filing Deadline for DTV Stations Providing Ancillary or Supplementary Services

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Digital television stations that provided ancillary or supplementary services between October 1, 2020 and September 30, 2021 must file an FCC Form 2100, Schedule G by **December 1, 2021**. TV stations that provided such services must pay to the FCC 5% of the gross revenues derived from providing such services. If, however, the station reporting revenue is a noncommercial TV station, the fee is reduced from 5% to 2.5% *for that portion* of the gross revenues derived from ancillary or supplementary services “which are nonprofit, noncommercial, and educational.”

Ancillary or supplementary services are all services provided on any portion of a TV station’s digital spectrum that is not necessary to provide free, over-the-air program streams. Examples of services that are considered ancillary or supplementary include, but are not limited to, “computer software distribution, data transmissions, teletext, interactive materials, aural messages, paging services, audio signals, [and] subscription video.” Video broadcast services provided with no direct charge to viewers are not considered ancillary or supplementary.

As we previously noted, the FCC eliminated in 2018 the obligation that *all* television stations file these reports annually, instead requiring only those stations that actually provided ancillary or supplementary services during the past year to file. Stations which did not provide ancillary or supplementary services during the 12-month period ending on September 30, 2021 are not required to submit the form.

Form 2100, Schedule G can be filed in the FCC’s **Licensing and Management System** (LMS) and the FCC has provided **visual instructions for the filing procedures**. Should you need assistance in preparing and making this filing, please contact your Pillsbury counsel or any of the attorneys in Pillsbury’s Communications Practice.