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Special Advisory to Broadcasters
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Communications Broadcast Advisory

New Program Reporting and Public Inspection File Online Posting Requirements for Television Stations

Television stations will now be required to file FCC Form 355, a new quarterly programming report, as well as post their public inspection files online. These new requirements apply only to full-power and Class A television stations.

On January 24, the FCC released a Report and Order, initially adopted November 27, 2007, mandating that television stations provide more information to the public and the FCC regarding their programming. This objective is to be accomplished in two ways. First, full-power and Class A television stations must file electronically with the FCC, on a quarterly basis, a new programming report on FCC Form 355 and place a copy of the completed form in their public inspection file. Second, full-power and Class A television stations must post virtually the entire contents of their public inspection file on the Internet where it can be viewed and downloaded by individuals far removed from that station's community of license. This new online requirement is in addition to and does not replace the continuing requirement that television stations maintain a "paper-based" public inspection file at their main studio. The Form 355 filing requirement will go into effect 60 days after Office of Management and Budget ("OMB") approval of the form is published in the Federal Register, or on the next quarterly reporting date, whichever is later. The new online posting requirement will go into effect 60 days after the FCC publishes a notice in the Federal Register announcing OMB approval. Stations that first launch a station website after the effective date must post their public inspection file online within 30 days of the website launch.

New Program Reporting Form 355

FCC Form 355 will replace the Quarterly Issues/Programs List traditionally prepared by television broadcasters. A copy of the new reporting form is attached. As a practical matter, the new form will require every full-power and Class A television station to examine the types, titles, content and amounts of virtually all programming aired over the station to make sure that the station is airing enough of what appears to be "FCC-preferred" programming. This, in turn, will require stations to fine-tune their automated program logging / traffic systems so that all information required by the new form can be readily and reliably extracted for

preparation and filing of FCC Form 355 on a quarterly basis. Coordination with television networks, and possibly other program suppliers, will also have to be enhanced.

The FCC is expected to make the new reporting form available online for completion and filing electronically with the FCC on a quarterly basis once OMB approves the form. Upon initial review of the Report and Order, there appears to be a discrepancy in the announced filing deadlines. The text of the Report and Order and the form itself indicate that the filing deadline will be April 30th for the first quarter report, July 30th for the second quarter report, October 30th for the third quarter report, and January 30th for the fourth quarter report. However, the text of the rule, which is attached to the Report and Order, states that the filing deadline will be April 10th for the first quarter report, July 10th for the second quarter report, October 10th for the third quarter report, and January 10th for the fourth quarter report. The form requires stations to list program information about material aired, such as local civic programming, local electoral affairs programming, public service announcements, and independently produced programming. The form also requires television stations to include information about closed captioning, the provision of emergency information for the disabled, and the station's efforts to ascertain the programming needs of various segments of the local community. The form also asks stations to disclose information about their video description of content, although the FCC's rules do not currently require stations to provide such programming. Stations must retain these reports in their public inspection file until their next renewal of license grant has become final.

Online Posting of Television Station Public Inspection Files

The FCC has also mandated that television stations make the contents of their public inspection files available online at no charge if the station has a website. The FCC stated that its public inspection file rule has long sought to involve the public in a dialogue with broadcasters regarding the services that stations provide to the public, but that the current requirement that viewers visit a station's main studio hinders that process and does not make use of currently available technology. The FCC found that many television stations already use websites to disseminate information to viewers and concluded that the requirement to post the public inspection file on those websites would not be a substantial burden. Specifically, the FCC said that stations that do not have websites are not required to create one for this purpose. In addition, stations may provide links to information available on any other website, including the FCC's website, rather than post redundant items, so long as the linked website is freely accessible and does not require registration. As an alternative to posting on the station's website, a station may post the contents of its public file on the website of its state broadcasters association, if the association permits that, as long as the station posts a direct link to that information on its own station website.

The Report and Order requires either that the following documents be "housed" on the website used by the station or that active links to these documents be provided on such website:

- FCC Authorizations (an active link to the station's authorizations on the FCC's website is an acceptable substitute)
- FCC Applications and related materials (active links to the station's applications on the FCC's website are an acceptable substitute)
- Citizen's Agreements, if any
- Contour Maps

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- Ownership Reports and related materials (an active link to the station's reports/materials on the FCC's website is an acceptable substitute)
- Equal Employment Opportunity File, e.g., Annual EEO Public File Reports, EEO Random Audit Letters from the FCC, and responses thereto
- "The Public and Broadcasting" Manual (an active link to the document on the FCC's website is an acceptable substitute)
- E-mail received from members of the public (paper letters from the public are exempt from this online requirements, although the website must disclose that paper letters are available in the station's paper-based public inspection file located at the station's main studio)
- Material relating to FCC investigations or complaints
- TV Standardized Public Interest Reporting Form 355 (an active link to the completed forms on the FCC's website is an acceptable substitute)
- Records regarding Children's Television Commercial Limits
- Children's Television Programming Reports (FCC Form 398) (an active link to the reports on the Commission's Children's Educational Television webpage at <http://gulfoss2.fcc.gov/prod/kidvid/prod/kidvid.htm> is an acceptable substitute)
- Local Public Notice Announcements
- Time Brokerage Agreements
- Must-Carry or Retransmission Consent Elections

Stations need not post online the contents of their political files. However, they must continue to be vigilant in keeping their "paper-based" political files updated on a timely basis and freely accessible for members of the public wishing to review those files during normal business hours (including lunch time).

In order to ensure that the new online public inspection files are accessible to persons with disabilities, the FCC is requiring that they conform to the World Wide Web Consortium's Web Content Accessibility ("W3C/WAI") guidelines. A summary of the current requirements of these guidelines is attached, although the guidelines are expected to be updated sometime in 2008.

Working with their website consultants and staff, television stations should immediately evaluate what changes to their websites, servers, personnel and security, as well as to their capital and maintenance budgets, will be necessary to modify their websites to accommodate the contents of their public inspection files. Stations will need to also consider how to handle the initial uploading tasks as well as the follow-on tasks of timely adding documents to and eliminating documents from their websites throughout the license term.

Television stations will be required to air announcements notifying their audiences twice a day about the existence, location and accessibility of the station's public inspection file, including information regarding the

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station's main studio and website. Presumably the FCC wants the announcement to identify the station's website address as well as the street address of the station's main studio. At least one of the two daily announcements must be aired between 6 p.m. and midnight local time.

The FCC stated that broadcasters with only rudimentary (an undefined term) websites that are updated irregularly or who demonstrate that compliance with the online public file posting requirements will be unduly financially burdensome (undefined) may seek a waiver of the online public file posting requirement.

At this time, the FCC is not requiring radio broadcasters to use the new FCC Form 355 in lieu of the quarterly issues/programs lists that have been required for decades, nor are radio stations being required to file those lists with the FCC.

This Advisory should be regarded as preliminary since the text of the Commission's new requirements was only made available yesterday.

If you have any questions, please contact any of the members of our Communications Practice Section.

Live Link

Federal Communications Commission, Children's Educational Television (KidVid)

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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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APPENDIX B**Standardized Television Disclosure Form**

Federal Communications Commission
Washington, D.C. 20554

Not approved by OMB
3060-XXXX

INSTRUCTIONS FOR FCC 355**STANDARDIZED TELEVISION DISCLOSURE FORM****GENERAL INSTRUCTIONS****Introduction**

This FCC Form is to be used to provide information on the efforts of commercial and noncommercial educational television broadcast stations to provide programming responsive to issues facing their communities. This is required by Sections 73.3526(e)(11)(i) and 73.3527(e)(8) of the Commission's Rules. See Report and Order in MM Docket No. 00-168 (2007). Licensees are required to include significant treatment of community issues.

Applicable Rules and Regulations

Before this form is prepared, the licensee should review the relevant portions of Sections 73.3526(e)(11)(i) and 73.3527(e)(8) in Title 47 of the Code of Federal Regulations (C.F.R.). Copies of Title 47 may be purchased from the Government Printing Office. Current prices may be obtained from the GPO Customer Service Desk at (202) 512-1803. For payment by credit card, call (202) 518-1800 or 1-866-518-1800, M-F, 8 a.m. to 4 p.m. EST; facsimile orders may be placed by dialing (202) 518-2233, 24 hours a day. Payment by check may be made to the Superintendent of Documents, Attn: New Orders, P.O. Box 371954, Pittsburgh, PA 15250-7954. Replies to questions on this form and the licensee's statements constitute representations on which the FCC may rely in considering the renewal of the licensee's television broadcast authorization. Thus, time and care should be devoted to all replies, which should reflect accurately the licensee's programming efforts to provide significant treatment of issues facing its community.

Preparation and Retention of Reports

Pursuant to 47 C.F.R. Sections 73.3526(e)(11)(i) and 73.3527(e)(8)(ii) of the Commission's Rules, each television broadcast licensee must prepare a Standardized Television Disclosure Form for each calendar quarter reflecting the community issues to which the station gave significant treatment with programming and the programming that provided this treatment. The licensee must place a copy of each quarterly report in its station's public inspection file by the 30th day of the succeeding calendar quarter (*i.e.*, by April 30 for the first quarterly report; by July 30 for the second quarterly report; by October 30 for the third quarterly report; and by January 30 for the fourth quarterly report). All entries on the report must be typed or legibly printed in ink. The signed original of each report should be retained in the station's non-public files, and a copy placed in the public inspection file and posted on the station's website.

Filing Reports with the Commission

The Standardized Television Disclosure Form 355 must be filed electronically with the Commission on a **quarterly** basis on the following dates: April 30 for the first quarter report; July 30 for the second quarter report; October 30 for the third quarter report; and January 30 of the succeeding year for the last quarter report. FCC Form 355 can be filed electronically over the Internet by accessing the FCC Web site at <http://www.fcc.gov>, selecting Electronic filing from the menu (above the Headlines banner), then selecting the Standardized Television Disclosure Form (FCC Form 355). Follow the instructions on that page for the electronic preparation and filing of the FCC 355 report. No fee is required to file this report.

Incorporation by Reference

Licensees may **NOT** incorporate by reference data, documents, exhibits, or other showings. All applicable items on this form must be answered without reference to a previous filing.

For Assistance

For assistance with preparing this form, contact the Video Division of the Media Bureau at the FCC, Washington, D.C. 20554, Telephone Number (202) 418-1600.

Definitions

For purposes of this Form, please use the following definitions:

Local Civic Affairs Programming: Local civic affairs programming is designed to provide the public with information about local issues. Local civic affairs programming includes, but is not limited to, broadcasts of interviews with or statements by elected or appointed officials and relevant policy experts on issues of importance to the community, government meetings, legislative sessions, conferences featuring elected officials, and substantive discussions of civic issues of interest to local communities or groups.

Local Electoral Affairs Programming: Local electoral affairs programming consists of candidate-centered discourse focusing on the local, state and United States Congressional races for offices to be elected by a constituency within the licensee's broadcast area. Local electoral affairs programming includes broadcasts of candidate debates, interviews, or statements, as well as substantive discussions of ballot measures that will be put before the voters in a forthcoming election.

Primary Channel: The primary channel means the FCC-required free over-the-air programming service which, like its analog predecessor, provides entertainment, sports, local and national news, election results, weather advisories, access for candidates, and public interest programming such as educational programming for children (*see Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Fifth Report and Order, 12 FCC Rcd 12,809, 12820-22 (1997)).

Public Service Announcements: A public service announcement is any announcement for which no consideration of any sort (including, but not limited to, cash, goods or services, in-kind contributions, endorsements, favorable treatment) is made to the licensee or any organization or entity associated with the licensee and which promotes programs, activities or services of federal, state or local governments or the programs, activities or services of nonprofit organizations.

Paid Public Service Announcements: A paid public service announcement is any announcement where consideration of any sort (including, but not limited to, cash, goods or services, in-kind contributions, endorsements, favorable treatment) is made to the licensee or any organization or entity associated with the licensee but which otherwise meets the definition of a public service announcement.

Independently Produced Programming: Independently produced programming is programming aired during prime-time that is produced by an entity not owned or controlled by an owner of a national television network, including but not limited to ABC, CBS, NBC, and FOX. If an owner of a national television network owns or controls more than a one-third financial interest in the program, acts as the distributor of such program in syndication, or owns the copyright in such program, the owner of a national television network will be considered to be the producer of that program.

INSTRUCTIONS FOR SPECIFIC ITEMS ON FCC FORM 355

Question 1. The licensee should provide its current call sign, channel number, and community of license, including city, state, county, and zip code, as set forth in its license authorization. The licensee should also provide its licensee name and ownership information, indicate the station's license renewal expiration date, indicate the call sign used on the preceding Standardized Television Disclosure Form prepared for the station (if different from the current call sign), and check the appropriate box indicating whether it is a network affiliate (if so, identify the affiliated network) or an independent station. In addition, if the licensee has a World Wide Web home page, it should provide the address. The licensee should also provide the stations' facility ID number, contact name and number, and list all non-primary programming streams and the main programming focus.

Question 2(a). List the channel and the average number of hours per week of the types of programming on the primary and all non-primary channels. The types of programming include, but are not limited to, local civic affairs programming, local electoral affairs programming, independently produced programming, and public service announcements, as defined above.

Question 2(b) – (c). List news programs or program segments, both national and local, aired during the quarter that include significant treatment of community issues, and that are not listed elsewhere on the form. Also indicate the date/time aired and the length.

Question 2(d) – (e). For each type of programming, as defined above, list programming and programming segments aired during the quarter that include significant treatment of community issues, and that are not listed elsewhere on the form. Also indicate the date/time aired and the length. Program segments may include, but are not limited to, a feature or story on a local public affairs or news program.

Question 2(f). List independently produced programming aired during the quarter. Also indicate the producer; date and time aired; length; and number of times aired.

Question 2(g). List all locally oriented programming that includes significant treatment of community issues, and that are not listed elsewhere on the form. Also indicate the length and the date/time aired.

Question 2(h). For all public service announcements that include significant treatment of community issues, aired during the quarter from 6am to 12 am, indicate the sponsoring organization; general goal of the PSA; name of the PSA; number of times aired; percentage of times aired during prime time; and the length.

Question 2(i). For all paid public service announcements that include significant treatment of community issues, aired during the quarter from 6am to 12 am, indicate the sponsoring organization; general goal of the PSA; name of the PSA; number of times aired; percentage of times aired during prime time; and the length.

Question 3. Indicate whether the station made any other efforts to serve the needs of its community. If it did, describe those efforts in the space provided.

Question 4(a). Indicate whether the licensee provided closed captioning as required by 47 C.F.R. §79.1. If any programming was not captioned due to an exemption (see 47 C.F.R. §79.1(d)) list the programming and state the basis for the exemption.

Question 4(b). Although Video Description is not required by statute or the Commission's Rules, indicate whether the station voluntarily provided video description services for the vision impaired and, if so, list the total number of hours aired with video description, the type of programming and which channel or program stream contained the description.

Question 5. Indicate whether the station made emergency information available to further protect life, health, safety, and property as defined in 47 C.F.R. 79.2. The Commission's Rules also require that broadcast emergency information be made accessible to persons with disabilities, and this form requires the licensee to indicate that they have met such requirements, pursuant to 47 C.F.R. § 79.2.

Signing Block. The Standardized Television Disclosure Form must be signed by a station manager.

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this form is authorized by the Communications Act of 1934, as amended. The information contained in this form is chiefly for the use of the broadcaster's community in evaluating the station's performance. The Commission, however, may be called upon to review the information provided in this form to evaluate licensees' performance either in the context of complaints filed during the license term or in its review of petitions to deny or informal objections to renewal applications. In reaching a determination on any such complaint, petition to deny or informal objection, or for law enforcement purposes, it may become necessary to refer personal information contained in this form to another government agency. In addition, all information provided in this form will be available for public inspection. Your response is required to ensure compliance with the public interest standard as contained in the Communications Act of 1934, as amended (47 U.S.C. § 151 *et seq.*).

We have estimated that each response to this collection of information will take __ hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain the required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PER, Paperwork Reduction Project (3060-0754), Washington, DC 20554. We will also accept your comments via the Internet if you send them to Judith-B.Herman@fcc.gov. Please DO NOT SEND COMPLETED APPLICATIONS TO THIS ADDRESS. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number of if we fail to provide you with this notice. This collection has been assigned an OMB control number of _____ - _____.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. Section 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. Section 3507.

Standardized Television Disclosure Form

Report reflects information for quarter ending (mm/dd/yy) _____

1. GENERAL INFORMATION

1. Call Sign	Channel Number	Community of License			
		City	State	County	Zip Code
Legal Name of Licensee					
Network Affiliation:	Nielsen DMA			World Wide Web Home Page Address (If Applicable)	
Publicly held <input type="checkbox"/>					
If no, please state type of ownership.					
<input type="checkbox"/> Independent	<input type="checkbox"/> Commercial <input type="checkbox"/> Noncommercial				
Facility ID Number	Previous Call Sign (If Applicable)		License Renewal Expiration Date (mm/dd/yyyy)		
List names(s) of parent companies or affiliates. For each, state if publicly held and, if not, type of ownership.					
Contact Name and Number					
Was this station transferred or assigned during this quarter? <input type="checkbox"/> Yes <input type="checkbox"/> No					
List primary and non-primary programming streams and the main programming focus:					
Channel	Main Programming Focus				

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2. PROGRAMMING INFORMATION

- a) **Overall Programming: List the channel and the average number of hours per week of the indicated types of programming on the primary and all non-primary channels.**

	Primary ¹³⁵	Non-Primary	Non-Primary	Non-Primary	Non-Primary	Non-Primary
Channel Number						
Total Programming Hours						
High Definition						
National News Programming						
Local News Programming produced by station						
Local News Programming produced by entity other than station (identify entity)						
Local Civic Affairs ¹³⁶						
Local Electoral Affairs ¹³⁷						
Independently Produced						
Other Local Programming						
Public Service Announcements						
Paid Public						

¹³⁵ If station is transmitting an analog signal, and to the extent analog programming stream differs from primary digital stream, please provide analog information on a separate attachment.

¹³⁶ To the extent this programming was carried during national or local news programming, please deduct from number of hours reported for those categories.

¹³⁷ To the extent this programming was carried during national or local news programming, please deduct from number of hours reported for those categories.

Please indicate which program or segment has: <input type="checkbox"/> Aired on the primary channel. <input type="checkbox"/> Been locally produced. <input type="checkbox"/> Previously aired on this or another station. <input type="checkbox"/> Been part of a regularly scheduled news program. <input type="checkbox"/> Been broadcast for payment or any sort of consideration to the licensee or any related organization or entity.	

- e) **Local Electoral Affairs Programming:** For each program or program segment aired this quarter that meets the definition of local electoral affairs programming, includes significant treatment of community issues, and is not listed elsewhere on this form, give the following information.

Title:	
Dates/Times Aired:	Length:
Please indicate which program or segment has: <input type="checkbox"/> Aired on the primary channel. <input type="checkbox"/> Been locally produced. <input type="checkbox"/> Previously aired on this or another station. <input type="checkbox"/> Been part of a regularly scheduled news program. <input type="checkbox"/> Been broadcast for payment or any sort of consideration to the licensee or any related organization or entity.	

- f) **Independently Produced Programming:** For each independently produced program that was aired on the primary channel during prime time this quarter, provide the following information.

Title:	Produced by:	
Dates/Times Aired:	Length:	Number of Times Aired:

- g) **Local Programming:** List all locally originated programming that includes significant treatment of community issues and is not listed elsewhere.

Title:	
Length:	Date/Time Aired:
<input type="checkbox"/> check if program was broadcast for consideration of any sort (including, but not limited to, cash, goods or services, in-kind contributions, endorsements, favorable treatment) to the licensee or any related organization or entity.	

- h) Public Service Announcements: Please complete the following information concerning all public service announcements that include significant treatment of community issues aired this quarter during the hours of 6 am-12 am.**

Sponsoring Organization		General Goal of PSA:
Name of PSA:		
No. of Times Aired:	% of times aired during prime time	PSA Length:

- i) Paid Public Service Announcements: Please complete the following information concerning all paid public service announcements that include significant treatment of community issues aired this quarter during the hours of 6 am-12 am.**

Sponsoring Organization		General Goal of PSA:
Name of PSA:		
No. of Times Aired:		PSA Length:

- j) Underserved Communities: List the programs aired that were aimed at serving the needs of underserved communities, *i.e.*, demographic segments of the community of license to whom little or no programming is directed.**

Title:	Underserved Community Served:
Program Type/Format:	
Program Length:	Date/Time Aired:
Describe how programming met the needs of the underserved community:	
<input type="checkbox"/> check if program was broadcast for consideration of any sort (including, but not limited to, cash, goods or services, in-kind contributions, endorsements, favorable treatment) to the licensee or any related organization or entity.	

- k) Religious Programming: Please identify any broadcasts of religious services or other locally produced religious programs that were aired at no charge.**

Title:	
Dates/Times Aired:	Length:

Service Announcements						
Closed Captioning						

- b) **National News:** For each program or program segment aired this quarter that is national news, includes significant treatment of community issues and is not listed elsewhere on this form, give the following information.

Title:	
Dates/Times Aired:	Length:
Please indicate which program or segment has: <input type="checkbox"/> Aired on the primary channel. <input type="checkbox"/> Been locally produced. <input type="checkbox"/> Previously aired on this or another station. <input type="checkbox"/> Been part of a regularly scheduled news program. <input type="checkbox"/> Been broadcast for payment or any sort of consideration to the licensee or any related organization or entity.	

- c) **Local News:** For each program or program segment aired this quarter that is local news, includes significant treatment of community issues and is not listed elsewhere on this form, give the following information.

Title:	
Dates/Times Aired:	Length:
Please indicate which program or segment has: <input type="checkbox"/> Aired on the primary channel. <input type="checkbox"/> Been locally produced. <input type="checkbox"/> Previously aired on this or another station. <input type="checkbox"/> Been part of a regularly scheduled news program. <input type="checkbox"/> Been broadcast for payment or any sort of consideration to the licensee or any related organization or entity.	

- d) **Local Civic Affairs Programming:** For each program or program segment aired this quarter that meets the definition of local civic affairs programming, includes significant treatment of community issues, and is not listed elsewhere on this form, give the following information.

Title:	
Dates/Times Aired:	Length:

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3. MEETING COMMUNITY NEEDS

a)	Did the licensee undertake any efforts to determine the programming needs of its community?	<input type="checkbox"/> Yes <input type="checkbox"/> No
b)	Did the licensee design any programming to address the needs identified in (a), above?	
If yes to (a) and/or (b), please describe the steps the licensee took below.		

4. SERVICE FOR PERSONS WITH DISABILITIES

a)	Closed Captioning: Has the broadcaster met the relevant closed captioning requirements? (See 47 C.F.R. 79.1).	<input type="checkbox"/> Yes <input type="checkbox"/> No
State the number of hours and percentage of each category of nonexempt video programming.		
	%	Hrs.
New English language programming		
Pre-Rule English language		
New Spanish language programming		
Pre-rule Spanish language programming		
Please list programs that were not captioned due to exemption and state the basis for the exemption.		
b)	Video Description: Did the licensee voluntarily provide video description services for the vision impaired?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, list the total number of hours with video description, the type of program and which channel contained video description.		

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5. CURRENT EMERGENCY INFORMATION

- a) Did the licensee broadcast information about a current emergency that was intended to further the protection of life, health, safety, and property as defined in 47 C.F.R. 79.2? Yes No

If yes, list the channels that contained the emergency information and the situation that prompted its use.

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- b) Was the information in 5(a) accessible to persons with disabilities as required in 47 C.F.R. 79.2? Yes No

If no, list the current emergency that was not accessible to persons with disabilities and the reason it was not accessible.

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6. LOCAL MARKETING AGREEMENTS, JOINT SALES AGREEMENTS, AND SIMILAR AGREEMENTS

The licensee leases or sells three hours or more per day to an entity other than the licensee pursuant to a local marketing agreement or time brokerage agreement, or has entered into a joint sales or similar agreement

- Yes No

If the answer is yes, please explain:

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WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312 (a)(1), AND/OR FOREFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Typed or Printed Name of Signatory	Typed or Printed Title of Signatory
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Signature	Date

“Level A” Priority 1 Checkpoints
Excerpted from Web Content Accessibility Guidelines 1.0
www.W3.org/WAI
(last accessed January 25, 2008)

1. Provide a text equivalent for every non-text element, including images, graphical representations of text, image map regions, audio or video.
2. Provide redundant text links for each active region of a server-side image map.
3. Provide an auditory description of the important information of the visual track of a multimedia presentation.
4. For any time-based multimedia presentation, synchronize equivalent alternatives with the presentation.
5. Ensure that all information conveyed with color is also available without color.
6. Clearly identify changes in the natural language of a document’s text and any text equivalents.
7. For data tables, identify row and column headers.
8. For data tables that have two or more logical levels of row or column headers, use markup to associate data cells and header cells.
9. Organize documents so they may be read without style sheets.
10. Ensure that equivalents for dynamic content are updated when the dynamic content changes.
11. Ensure that pages are usable when scripts, applets, or other programmatic objects are turned off or not supported. If this is not possible, provide equivalent information on an alternative accessible page.
12. Avoid causing the screen to flicker.
13. Make programmatic elements such as scripts and applets directly accessible or compatible with assistive technologies if functionality is important.
14. Provide client-side image maps instead of server-side image maps except where the regions cannot be defined with an available geometric shape.
15. If, after best efforts, you cannot create an accessible page, provide a link to an alternative page that uses W3C technologies, is accessible, has equivalent information or functionality and is updated as often as the inaccessible page.

16. Title each frame to facilitate frame identification and navigation.
17. Use the clearest simplest language appropriate for a site's content.