

## Commercial Stations' Biennial Ownership Reports: File by November 1, 2009

by Richard R. Zaragoza and Christine A. Reilly

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*As previously reported, the FCC released an Order on May 29, 2009, suspending the biennial ownership reporting requirement for commercial radio and television broadcast stations that would otherwise have been required to file their reports by June 1, August 1 or October 1, 2009.*

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Accordingly, commercial radio stations licensed to communities in Alaska, American Samoa, Florida, Guam, Hawaii, Mariana Islands, Oregon, Puerto Rico, Saipan, Virgin Islands and Washington and commercial television stations licensed to communities in Iowa or Missouri need not file their Biennial Ownership Reports by October 1. Rather, they will be required to file their Biennial Ownership Reports by November 1, 2009, as will all other commercial, full-power AM, FM, TV, LPTV and Class A television stations licensed to communities in any State or Territory of the United States.

The FCC has modified FCC Form 323 which is used by commercial broadcast station to file their Ownership Reports. As of the date of this Advisory, OMB has received numerous objections to the revised form and has not yet acted. A copy of that draft can be viewed at the following link: [http://www.reginfo.gov/public/do/PRAViewIC?ref\\_nbr=200908-3060-001&icID=29435](http://www.reginfo.gov/public/do/PRAViewIC?ref_nbr=200908-3060-001&icID=29435). The FCC has stated that if OMB does not approve the newly revised FCC Form 323 by November 1, all filers that would have been required to file the form between by June 1, by August 1 or by October 1, 2009 will be required to file the now current form by November 1.

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If you have any questions about the content of this advisory, please contact any of the lawyers in the Communications Practice Section.

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