
Reminder: Biennial Ownership Reports Are Due August 1, 2009 for Select Noncommercial Educational Radio and Television Stations

by Richard R. Zaragoza, Paul A. Cicelski and Christine A. Reilly

As we recently reported, the FCC has altered the schedule for the filing of Biennial Ownership Reports by commercial broadcast stations. Those Reports must now be filed by November 1, 2009 and by the same date every two years thereafter. However, the staggered schedule for the filing of Biennial Ownership Reports for noncommercial educational broadcast stations remains unchanged for the time being, subject to a pending Further NPRM. For non-commercial radio stations in California, North Carolina and South Carolina and noncommercial television stations in Illinois and Wisconsin, the reports are due August 1, 2009.

Noncommercial educational radio stations licensed to communities in California, North Carolina or South Carolina and noncommercial educational television stations licensed to communities in Illinois or Wisconsin must file their Biennial Ownership Reports by **August 1, 2009**.

As discussed in a Client Advisory sent earlier this month, the FCC released an Order on May 29, 2009, suspending the biennial ownership reporting requirement for licensees of *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. Accordingly, all commercial radio and television stations must submit biennial ownership reports by **November 1 every other year, starting in 2009**.

However, the uniform November 1 deadline does not apply to noncommercial, educational broadcast stations. The FCC Order has outstanding a Further Notice of Proposed Rulemaking seeking comments on, among other things, whether the Commission should adopt a similar uniform, national reporting deadline for all noncommercial educational radio and television broadcast stations. To date, that proceeding

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remains unresolved. As a result, noncommercial educational radio and television stations are required to continue preparing and filing biennial ownership reports every two years by the anniversary date of the station's license renewal filing.

Should there be any questions concerning this matter, please contact any of the attorneys in the Communications Group.

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