

January 2, 2015

MEMORANDUM

From: Wilkinson Barker Knauer, LLP

Re: *WBK Advisory - 2015 Calendar of Important Dates for Broadcasters*

With the new year almost upon us, broadcasters should be taking stock of their regulatory obligations for 2015. Each year, every broadcaster has many routine regulatory deadlines that it must meet. A broadcaster's regulatory obligations include its Equal Employment Opportunities ("EEO") public file report, quarterly issues/programs lists, and annual FCC regulatory fees, all of which are required every year. Television stations have the extra burden of complying with requirements of the children's television rules and the annual FCC Form 317.

But each year also brings its own regulatory obligations, and 2015 is no different. As the TV renewal cycle comes to a close in 2015, some TV broadcasters still have obligations to meet the deadlines imposed by the renewal process. For radio stations that were at the head of the license renewal line, we cross the mid-point between that last renewal and your next one – and that brings the obligation for the filing of EEO Mid-Term Reports for radio employment units with 11 or more full-time employees in certain states. All commercial broadcasters also will face the obligation to submit their Biennial Ownership Report(s) in 2015.

To help keep track of these and other obligations, we have put together this advisory to provide a preview of, and some guidance for, many of the important FCC compliance-related dates, as well as other deadlines broadly applicable to significant portions of the broadcast industry. The attached calendar is not intended to cover all filing dates that apply to every station or licensee. Instead, the calendar is meant to highlight some of the more critical deadlines which we are able to identify in advance. Remember, these dates can change, and new deadlines for action can be added, so be sure to keep up with the latest developments by talking to your attorney or other advisors.

It is also important to check with your accountant, tax advisor, and local counsel on dates for filings such as those relating to local business and real estate fees and taxes, filing dates for Equal Employment Opportunity Commission submissions for large employers, and other requirements that may be applicable to your station(s).

In our calendar, we provide a description of the obligation, the due date and the place where compliance is required (*e.g.*, through an FCC filing, an addition to the public file, etc.). Note that TV broadcasters have an online public file obligation, and so they must ensure that the required documentation (like the annual EEO public file report or the quarterly issues/programs lists) is uploaded by the applicable deadline to the station's online public file hosted by the FCC.

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Also included in the calendar are other one-time events unique to this coming year, including certain accessibility compliance obligations for television stations that take effect in 2015. New closed captioning requirements for television stations will take effect on March 16, 2015. These new obligations require stations to make best efforts to obtain certifications from video programmers that their programming (i) complies with the FCC's captioning quality standards, (ii) adheres to the Commission's "best practices" for video programmers, or (iii) is exempt from the closed captioning rules under one or more properly attained and specified exemptions. Stations will need to keep records of their activities related to the maintenance, monitoring, and technical checks of their captioning equipment. In addition, new rules for compliance practices went into effect in 2014 for stations that use the Electronic Newsroom Technique ("ENT") to meet the captioning obligations for certain programming. New standards for processing FCC complaints about stations using ENT will become effective on March 16, 2015, along with the other captioning quality standards referenced above. TV stations using ENT (or industry organizations on their behalf), in consultation with consumer groups, must jointly submit a one-time ENT Progress Report to the FCC no later than June 30, 2015, reporting on their experiences in following these FCC's ENT "best practices." As this may well be a filing put together by industry groups (as opposed to an obligation fulfilled by each individual station), we have left this date off the attached calendar.

Stations will also have new accessibility compliance obligations for televised emergency information. Beginning May 26, 2015, television stations must use a secondary audio stream to convey televised emergency information aurally, when such information is conveyed visually during programming other than newscasts. The information imparted over the secondary audio channel must still follow an aural tone.

Beginning July 1, 2015, commercial television stations that are affiliated with one of the Big 4 networks in a Top 60 market (as determined by Nielsen as of January 1, 2015) must provide 50 hours of video description per calendar quarter, either during prime time or on children's programming, on each programming stream on which they carry one of the Big 4 networks. If a station in a Top 60 market becomes affiliated with a Big 4 network after July 1, 2015, it must begin compliance with these requirements no later than 3 months after the affiliation agreement is finalized. Television stations that are affiliated or otherwise associated with a network must already pass through video description when the network provides video description and the station has the technical capability to pass through the video description, unless the station is using the technology for another purpose related to the programming (*e.g.*, Spanish-language audio) that would conflict with providing the video description.

While we are in a lull for Federal elections in 2015, there are still many states that will have elections for various state and local offices this coming year. Thus, broadcasters in states with such elections must be mindful of a number of Lowest Unit Rate periods during which stations can charge political candidates (Federal, state, and local) who are running in a general or primary election no more than the Lowest Unit Rate for the same class and amount of time on

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the station. Lowest Unit Rate periods begin 45 days before each primary election and 60 days before each general election. The 45-day period also applies to primary run-off elections. While the reasonable access provisions of the political rules do not apply to state and local races, if stations decide to sell time to candidates in these elections, they do have to charge Lowest Unit Rates during these political windows.

In the calendar, we have identified the Lowest Unit Rate periods for certain gubernatorial and state legislative elections taking place in 2015. These dates are based on information we found on certain state websites as of November 25, 2014, and they may change before the actual elections. ***Thus, it is important for stations to confirm these election dates, and the corresponding Lowest Unit Rate periods, for the states they serve.*** There are many other dates for state and local primaries and elections that will arise in 2015, and there are always special elections that come up as vacancies occur in political offices. Thus, be aware of the political windows in which the Lowest Unit Rate will be applicable for candidates participating in those elections.

For TV stations, as the year progresses, we may well see filing obligations that arise as part of the Incentive Auction process, by which the FCC seeks to clear television spectrum by paying some stations to give up their licenses or otherwise vacate their spectrum, so that the spectrum can be resold to wireless users. The FCC is looking to begin the auction in early 2016, so there may be filing deadlines in 2015 that stations will need to observe.

Currently, there is also a September 1 deadline by which all LPTV stations and TV translators must convert to digital operations. The FCC is currently considering pushing back that date to a time after the Incentive Auction; thus, this date is not included on our calendar. But watch as the FCC's proceeding which is considering the extension progresses, to make sure that the deadline in fact is delayed.

The calendar also reflects the monthly obligation to pay SoundExchange royalties for streaming music on the Internet, and the associated requirement to provide information about the songs played on the Internet when that monthly fee is paid. Stations also have obligations to pay ASCAP, BMI, and SESAC. Review your agreements with these organizations to make sure that you meet all required deadlines.

As the year progresses, there will no doubt be other compliance deadlines that arise. We try to provide information about many of these deadlines, and about other regulatory issues that arise during the course of the year, on our blog: <http://www.broadcastlawblog.com/>. Check our blog regularly, and talk to any of the attorneys in our Broadcast Group, for more information about the many deadlines and other issues that will be important to broadcasters in 2015.

With that background, some important dates for 2015 are set out in the calendar that follows.

**2015 BROADCASTERS
CALENDAR**

JANUARY 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
January 1, 2015	Airing of License Renewal Post-Filing Announcements (third of the required six announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont
	Airing of License Renewal Pre-Filing Announcements (third of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in New Jersey and New York
January 10, 2015	Records showing compliance with commercial limits on Children’s Television Programming during Q4-2014 must be placed in stations’ public inspection files	Stations’ Public Inspection Files	Commercial Full-Power and Class A Television Stations
	Issues/Programs Lists for Q4-2014 must be placed in stations’ public inspection files	Stations’ Public Inspection Files	Commercial and Noncommercial Full Power and Class A Television Stations; Commercial and Noncommercial AM and FM Radio Stations
	Documentation of Class A Television Continuing Eligibility should be placed in stations’ public inspection files ¹	Stations’ Public Inspection Files	Class A Television Stations

JANUARY 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
January 12, 2015 ²	Children’s Television Programming Reports (FCC Form 398) for Q4-2014 must be filed and placed in stations’ public inspection files ³	FCC; Stations’ Public Inspection Files	Commercial Full-Power and Class A Television Stations
January 14, 2015	For songs streamed during the month ending Nov. 30, 2014 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁴
January 16, 2015	Airing of License Renewal Post-Filing Announcements (fourth of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont
	Airing of License Renewal Pre-filing Announcements (last of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in New Jersey and New York
January 31, 2015	Annual, nonrefundable minimum fee of \$500 for each channel and station	SoundExchange	Webcasters ⁴
	Notice of Election for treatment as a “small broadcaster”	SoundExchange	Broadcasters streaming (on the web) less than 27,777 aggregate tuning hours each year

JANUARY 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
January 31, 2015	Notice of Election to be covered by certain agreements entered into under the Webcasters Settlement Act	SoundExchange	Certain webcasters who elect to pay rates other than those set by the Copyright Royalty Board ⁵

FEBRUARY 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
February 1, 2015	Airing of License Renewal Post-Filing Announcements (fifth of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont
	Airing of License Renewal Post-Filing Announcements (first of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in New Jersey and New York
	Airing of License Renewal Pre-Filing Announcements (first of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in Delaware and Pennsylvania
	Annual EEO Public File Reports must be placed in stations' public inspection files	Stations' Public Inspection File	Commercial and Noncommercial Full-Power and Class A Television Stations and AM and FM Radio Stations in Arkansas, Kansas, Louisiana, Mississippi, Nebraska, New Jersey, New York, and Oklahoma that are part of an Employment Unit ⁶ with 5 or more full-time employees

FEBRUARY 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
February 2, 2015 ⁷	Biennial Ownership Reports (FCC Form 323-E) must be filed and placed in stations' public inspection files ³	FCC; Stations' Public Inspection Files	<u>Noncommercial</u> Television Stations in Arkansas, Louisiana, Mississippi, New Jersey, and New York ; <u>Noncommercial</u> AM and FM Radio Stations in Kansas, Nebraska, and Oklahoma
	License Renewal Applications (FCC Form 303-S) and EEO Program Reports (FCC Form 396) must be filed ³	FCC; Stations' Public Inspection Files	Commercial and Noncommercial Full-Power and Class A Television Stations, TV Translators, ⁸ and LPTV Stations in New Jersey and New York
February 14, 2015	For songs streamed during the month ending Dec. 31, 2014 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁴
February 16, 2015	Airing of License Renewal Post-Filing Announcements (last of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont

FEBRUARY 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
February 16, 2015	Airing of License Renewal Post-Filing Announcements (second of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in New Jersey and New York
	Airing of License Renewal Pre-Filing Announcements (second of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in Delaware and Pennsylvania

MARCH 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
March 1, 2015	Airing of License Renewal Post-Filing Announcements (third of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in New Jersey and New York
	Airing of License Renewal Pre-Filing Announcements (third of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in Delaware and Pennsylvania
March 16, 2015	Airing of License Renewal Post-Filing Announcements (fourth of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in New Jersey and New York
	Airing of License Renewal Pre-Filing Announcements (last of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations Delaware and Pennsylvania
	Compliance with new obligations imposed by Closed Caption Quality Rules, including caption quality standards, “best practices” for captioning, recordkeeping requirements, and new standards for processing FCC complaints about stations using the Electronic Newsroom Technique (ENT).	N/A	Any Television Station Licensed by the FCC

MARCH 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
March 17, 2015	For songs streamed during the month ending Jan. 31, 2015 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁴

APRIL 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
April 1, 2015	Airing of License Renewal Post-Filing Announcements (fifth of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in in New Jersey and New York
	License Renewal Applications (FCC Form 303-S) and EEO Program Reports (FCC Form 396) must be filed ³	FCC; Stations' Public Inspection Files	Commercial and Noncommercial Full-Power and Class A Television Stations, TV Translators, ⁸ and LPTV Stations in Delaware and Pennsylvania
	Airing of License Renewal Post-Filing Announcements (first of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in Delaware and Pennsylvania
	Annual EEO Public File Reports must be placed in stations' public inspection files	Stations' Public Inspection File	Commercial and Noncommercial Full-Power and Class A Television Stations and AM and FM Radio Stations in Delaware, Indiana, Kentucky, Pennsylvania, Tennessee, and Texas that are part of an Employment Unit ⁶ with 5 or more full-time employees
	Biennial Ownership Reports (FCC Form 323-E) must be filed and placed in stations' public inspection files ³	FCC; Stations' Public Inspection Files	<u>Noncommercial</u> Television Stations in Delaware, Indiana, Kentucky, Pennsylvania, and Tennessee ; <u>Noncommercial</u> AM and FM Radio Stations in Texas

APRIL 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
April 4, 2015	Begin charging Lowest Unit Rates to political candidates who are running in primary elections to be held on May 19, 2015	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for Federal, state, and local races to be decided by any May 19 th primary election A primary election is being held in Kentucky on May 19, 2015 ⁹
April 10, 2015	Children’s Television Programming Reports (FCC Form 398) for Q1-2015 must be filed and placed in stations’ public inspection files ³	FCC; Stations’ Public Inspection Files	Commercial Full-Power and Class A Television Stations
	Records showing compliance with commercial limits on Children’s Television Programming during Q1-2015 must be placed in stations’ public inspection files	Stations’ Public Inspection Files	Commercial Full-Power and Class A Television Stations
	Issues/Programs Lists for Q1-2015 must be placed in stations’ public inspection files	Stations’ Public Inspection Files	Commercial and Noncommercial Full Power and Class A Television Stations; Commercial and Noncommercial AM and FM Radio Stations
	Documentation of Class A Television Continuing Eligibility should be placed in stations’ public inspection files ¹	Stations’ Public Inspection Files	Class A Television Stations

APRIL 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
April 14, 2015	For songs streamed during the month ending Feb. 28, 2015 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁴
April 16, 2015	Airing of License Renewal Post-Filing Announcements (last of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in New Jersey and New York
	Airing of License Renewal Post-Filing Announcements (second of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in Delaware and Pennsylvania
April 25, 2015	Begin charging Lowest Unit Rates to political candidates who are running in primary elections to be held on June 9, 2015	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for Federal, state, and local races to be decided by any June 9 th primary election A primary election is being held Virginia on June 9, 2015 ⁹

MAY 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
May 1, 2015	Airing of License Renewal Post-Filing Announcements (third of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations Delaware and Pennsylvania
May 15, 2015	For songs streamed during the month ending Mar. 31, 2015 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁴
May 16, 2015	Airing of License Renewal Post-Filing Announcements (fourth of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in Delaware and Pennsylvania
May 26, 2015	Television stations must use a secondary audio stream to convey televised emergency information aurally, when such information is conveyed visually during programming other than newscasts ¹⁰	N/A	Any Television Station Licensed by the FCC

JUNE 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
June 1, 2015	Airing of License Renewal Post-Filing Announcements (fifth of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in Delaware and Pennsylvania
	Annual EEO Public File Reports must be placed in stations' public inspection files	Stations' Public Inspection File	Commercial and Noncommercial Full-Power and Class A Television Stations and AM and FM Radio Stations in Arizona, Idaho, Maryland, Michigan, Nevada, New Mexico, Ohio, Utah, Virginia, West Virginia, Wyoming , and the District of Columbia that are part of an Employment Unit ⁶ with 5 or more full-time employees
	Biennial Ownership Reports (FCC Form 323-E) must be filed and placed in stations' public inspection files ³	FCC; Stations' Public Inspection Files	<u>Noncommercial</u> Television Stations in Michigan and Ohio ; <u>Noncommercial</u> AM and FM Radio Stations in Arizona, Idaho, Maryland, Nevada, New Mexico, Utah, Virginia, West Virginia, Wyoming , and the District of Columbia
	Broadcast Mid-Term Report (FCC Form 397)	FCC; Stations' Public Inspection Files	Radio Station Employment Units ⁶ with 11 or more full-time employees in Maryland, Virginia, West Virginia , and the District of Columbia

JUNE 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
June 14, 2015	For songs streamed during the month ending Apr. 30, 2015 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁴
June 16, 2015	Airing of License Renewal Post-Filing Announcements (last of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power and Class A Television Stations in Delaware and Pennsylvania
June 20, 2015	Begin charging Lowest Unit Rates to political candidates who are running in primary elections to be held on August 4, 2015	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for Federal, state, and local races to be decided by any August 4 th primary election Primary elections are being held Mississippi on August 4, 2015 ⁹

JULY 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
July 1, 2015	Certain Commercial TV Stations must provide 50 hours of video description per calendar quarter, either during prime time or on children’s programming, on each programming stream on which they carry one of the Big 4 networks ¹¹	N/A	Commercial TV Stations that are affiliated with a Big 4 Network in a Top 60 Market (as of January 1, 2015, determined by Nielsen)
July 10, 2015	Children’s Television Programming Reports (FCC Form 398) for Q2-2015 must be filed and placed in stations’ public inspection files ³	FCC; Stations’ Public Inspection Files	Commercial Full-Power and Class A Television Stations
	Records showing compliance with commercial limits on Children’s Television Programming during Q2-2015 must be placed in stations’ public inspection files	Stations’ Public Inspection Files	Commercial Full-Power and Class A Television Stations
	Issues/Programs Lists for Q2-2015 must be placed in stations’ public inspection files	Stations’ Public Inspection Files	Commercial and Noncommercial Full Power and Class A Television Stations; Commercial and Noncommercial AM and FM Radio Stations
	Documentation of Class A Television Continuing Eligibility should be placed in stations’ public inspection files ¹	Stations’ Public Inspection Files	Class A Television Stations

JULY 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
July 11, 2015	Begin charging Lowest Unit Rates to political candidates who are running in primary elections to be held on August 25, 2015	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for Federal, state, and local races to be decided by any August 25 th primary election Primary run-off elections are being held Mississippi on August 25, 2015 ⁹
July 15, 2015	For songs streamed during the month ending May 31, 2015 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁴
July 31, 2015 ¹²	Requests to receive compensation for retransmissions of over-the-air television signals by cable and satellite systems	Copyright Royalty Board	Eligible Television Stations ¹³

AUGUST 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
August 1, 2015	Annual EEO Public File Reports must be placed in stations' public inspection files	Stations' Public Inspection File	Commercial and Noncommercial Full-Power and Class A Television Stations and AM and FM Radio Stations in California, Illinois, North Carolina, South Carolina , and Wisconsin that are part of an Employment Unit ⁶ with 5 or more full-time employees
August 3, 2015 ¹⁴	Biennial Ownership Reports (FCC Form 323-E) must be filed and placed in stations' public inspection files ³	FCC; Stations' Public Inspection Files	<u>Noncommercial</u> Television Stations in Illinois and Wisconsin ; <u>Noncommercial</u> AM and FM Radio Stations in California, North Carolina , and South Carolina
	Broadcast Mid-Term Report (FCC Form 397)	FCC; Stations' Public Inspection Files	Radio Station Employment Units ⁶ with 11 or more full-time employees in North Carolina and South Carolina
August 14, 2015	For songs streamed during the month ending June 30, 2015 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁴

SEPTEMBER 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
September 4, 2015	Begin charging Lowest Unit Rates to political candidates who are running in general elections to be held on November 3, 2015	N/A	<p>Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for Federal, state, and local races to be decided by any November 3rd general election</p> <p>Gubernatorial elections are being held in Kentucky and Mississippi, and general state legislative elections are being held in Mississippi, New Jersey, and Virginia on November 3, 2015⁹</p>
September 9, 2015	Begin charging Lowest Unit Rates to political candidates who are running in primary elections to be held on October 24, 2015	N/A	<p>Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for Federal, state, and local races to be decided by an October 24th primary election</p> <p>Primary elections are being held Louisiana on October 24, 2015⁹</p>

SEPTEMBER 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
September 2015 (day TBD) ¹⁵	Annual FCC Regulatory Fees must be paid.	FCC	Commercial Full-Power and Class A Television Stations, TV Translators, TV Boosters, and LPTV Stations; Commercial AM and FM Radio Stations, FM Translators, and FM Boosters
September 14, 2015	For songs streamed during the month ending July 31, 2015 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁴
September 22, 2015	Begin charging Lowest Unit Rates to political candidates who are running in general elections to be held on November 21, 2015	N/A	Commercial Full-Power and Class A Television Stations and AM and FM Radio Stations that sell time to candidates for Federal, state, and local races to be decided by a November 21 st general election Gubernatorial and general state legislative elections are being held in Louisiana on November 21, 2015 ⁹

OCTOBER 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
October 1, 2015	Broadcast Mid-Term Report (FCC Form 397)	FCC; Stations' Public Inspection Files	Radio Station Employment Units ⁶ with 11 or more full-time employees in Florida, Puerto Rico, and the Virgin Islands
	Annual EEO Public File Reports must be placed in stations' public inspection files	Stations' Public Inspection File	Commercial and Noncommercial Full-Power and Class A Television Stations and AM and FM Radio Stations in Alaska, Florida, Hawaii, Iowa, Missouri, Oregon, Washington, American Samoa, Guam, the Mariana Islands, Puerto Rico, Saipan, and the Virgin Islands that are part of an Employment Unit ⁶ with 5 or more full-time employees
	Biennial Ownership Reports (FCC Form 323-E) must be filed and placed in stations' public inspection files ³	FCC; Stations' Public Inspection Files	<u>Noncommercial</u> Television Stations in Iowa and Missouri ; <u>Noncommercial</u> AM and FM Radio Stations in Alaska, Florida, Hawaii, Oregon, Washington, American Samoa, Guam, the Mariana Islands, Puerto Rico, Saipan, and the Virgin Islands

OCTOBER 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
October 10, 2015	Records showing compliance with commercial limits on Children’s Television Programming during Q3-2015 must be placed in stations’ public inspection files	Stations’ Public Inspection Files	Commercial Full-Power and Class A Television Stations
	Issues/Programs Lists for Q3-2015 must be placed in stations’ public inspection files	Stations’ Public Inspection Files	Commercial and Noncommercial Full Power and Class A Television Stations; Commercial and Noncommercial AM and FM Radio Stations
	Documentation of Class A Television Continuing Eligibility should be placed in stations’ public inspection files ¹	Stations’ Public Inspection Files	Class A Television Stations
October 13, 2015¹⁶	Children’s Television Programming Reports (FCC Form 398) for Q3-2015 must be filed and placed in stations’ public inspection files ³	FCC; Stations’ Public Inspection Files	Commercial Full-Power and Class A Television Stations
October 15, 2015	For songs streamed during the month ending Aug. 31, 2015 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁴

NOVEMBER 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
November 2, 2015 ¹⁷	Biennial Ownership Reports (FCC Form 323) must be filed and placed in stations' public inspection files ³	FCC; Stations' Public Inspection Files	All Commercial Radio and Television Stations, including LPTV and Class A stations
November 14, 2015	For songs streamed during the month ending Sept. 30, 2015 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁴

DECEMBER 2015

DEADLINE FOR ACTION, FILING OR PAYMENT	WHAT ACTION IS REQUIRED or WHAT MUST BE FILED OR PAID?	WHERE MUST IT BE FILED OR PAID?	WHO MUST FILE OR ACT?
December 1, 2015	Broadcast Mid-Term Report (FCC Form 397)	FCC; Stations' Public Inspection Files	Radio Station Employment Units ⁶ with 11 or more full-time employees in Alabama and Georgia
	Annual EEO Public File Reports must be placed in stations' public inspection files	Stations' Public Inspection File	Commercial and Noncommercial Full-Power and Class A Television Stations and AM and FM Radio Stations in Alabama, Colorado, Connecticut, Georgia, Maine, Massachusetts, Minnesota, Montana, New Hampshire, North Dakota, Rhode Island, South Dakota, and Vermont that are part of an Employment Unit ⁶ with 5 or more full-time employees
	Biennial Ownership Reports (FCC Form 323-E) must be filed and placed in stations' public inspection files ³	FCC; Stations' Public Inspection Files	<u>Noncommercial</u> Television Stations in Colorado, Minnesota, Montana, North Dakota, and South Dakota; <u>Noncommercial</u> AM and FM Radio Stations in Alabama, Connecticut, Georgia, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont

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December 1, 2015	Annual DTV Ancillary/Supplementary Services Report (FCC Form 317) must be filed	FCC	Commercial and Noncommercial Full-Power and Digital Class A Television Stations, Digital TV Translators, and Digital LPTV Stations ¹⁸
December 15, 2015	For songs streamed during the month ending Oct. 31, 2015 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁴

ENDNOTES

- ¹ The FCC's rules do not specifically require Class A Television Stations to place documentation in their public inspection files demonstrating continuing eligibility for Class A Status on a quarterly basis. However, preparation of the quarterly issues/programs lists provides stations a good opportunity to prepare documentation supporting Class A eligibility. Accordingly, Class A Television Stations are strongly encouraged to place this information in their public inspection files ten (10) days after the end of each calendar quarter.
- ² Because the January 10th deadline falls on a Saturday and these documents must be submitted to the FCC, the January 10th deadline is extended to the next business day (Monday, January 12th).
- ³ Because these forms are filed with the FCC and TV stations' public inspection files are now maintained online, TV stations do not have to upload these forms to their online public inspection files. Instead, the FCC will upload a TV station's electronically filed form to its online public inspection file.
- ⁴ This includes radio stations that simulcast their programming on the Internet.
- ⁵ This DOES NOT include broadcasters that are members or affiliates of NPR, American Public Radio, Public Radio International, or Public Radio Exchange. Additionally, members of the National Federation of Community Broadcasters and any other public radio stations that qualify for CPB funding are not subject to this filing requirement, as well as certain other noncommercial broadcasters who elected coverage under a particular royalty settlement agreement and are deemed to be covered by that agreement until they notify SoundExchange to the contrary. Under certain other agreements, if no election is made, by default the previous election remains in place. It is important to check the terms of the agreement under which you are operating to make sure that you make any required election by the deadline date.
- ⁶ For EEO purposes, a "Station Employment Unit" is a station or group of commonly-controlled stations serving the same general geographic area with at least one common employee.
- ⁷ Because the February 1st deadline falls on a Sunday and these documents must be submitted to the FCC, the February 1st deadline is extended to the next business day (Monday, February 2nd).
- ⁸ LPFM stations and TV and FM Translator Stations are not required to file EEO Program Reports (FCC Form 396).
- ⁹ These election dates were identified based on information we found on certain state websites as of November 25, 2014. It is important to remember that many primary dates are subject to change, and there may be other Lowest Unit Rate periods for state and local elections that are not identified on this calendar.
- ¹⁰ The information imparted over the secondary audio channel must still follow an aural tone.
- ¹¹ If a station in a Top 60 market becomes affiliated with a Big 4 network after July 1, 2015, it must begin compliance with these requirements no later than 3 months after the affiliation agreement is finalized. Television stations that are affiliated or otherwise associated with a network must pass through video description when the network provides video description and the station has the technical capability to pass through the video description, unless the station is using the technology for another purpose related to the programming (*e.g.*, Spanish-language audio) that would conflict with providing the video description.
- ¹² Claims for compensation from the 2014 funds may be filed beginning in July 2015, but must be filed no later than July 31, 2015.
- ¹³ A television station may be eligible to receive compensation from the 2014 cable and satellite royalty funds if: (1) it holds the copyright to programming it has produced; and (2) its signal was either carried as a distant signal on a cable system in 2014 or rebroadcast by a satellite television service provider directly to individual homes.
- ¹⁴ Because the August 1st deadline falls on a Saturday and this form must be submitted to the FCC, the August 1st deadline is extended to the next business day (Monday, August 3rd).

¹⁵ The precise date for payment of annual FCC regulatory fees is usually determined during the summer. However, the deadline typically is set for a date in early to mid-September, though the deadline may be as early as sometime in August to as late as the end of September.

¹⁶ Because the October 10th deadline falls on a Saturday and this form must be submitted to the FCC, the October 10th deadline is extended to the next business day (Tuesday, October 13th due to the Columbus Day holiday).

¹⁷ Because the November 1st deadline falls on a Sunday and this form must be submitted to the FCC, the November 1st deadline is extended to the next business day (Monday, November 2nd).

¹⁸ Filers must also pay a fee equal to 5% of any gross revenues received from any ancillary or supplementary services provided for a subscription fee or charge, or for ancillary or supplementary services for which the filer received compensation from a third party (other than a commercial advertiser) in exchange for transmission of material provided by the third party.