

January 30, 2019

2019 Calendar of Important Dates for Broadcasters¹

Another year has begun, though this one with a twist – with much of the federal government shut down for the bulk of January because of the budget battle between the President and Congress. The shutdown, which affected the FCC and other government agencies, and slowed production of this calendar as it put many dates on hold until the government fully reopened. And, of course, there is the potential for further budget battles that may affect dates going forward. So there are caveats about the dates listed below.

Nevertheless, there are multiple routine dates that will arise at some point. Even though the FCC has, for the last two years, pursued a number of deregulatory moves, broadcasters for the foreseeable future still face a host of regulatory obligations. Each year, these obligations include the requirement to prepare an annual Equal Employment Opportunities (“EEO”) public inspection file report, to upload to their public files quarterly issues/programs lists, and to pay annual FCC regulatory fees. Television stations have the extra burden of complying with requirements of the children’s television rules and the filing of quarterly FCC Form 398 children’s television programming reports and, if they are providing fee-based nonbroadcast services with their digital spectrum, an annual DTV Ancillary/Supplementary Services Reports (now known as FCC Form 2100 Schedule G, formerly FCC Form 317). Each year also brings its own distinct regulatory obligations, and 2019 is no different. The repacking of the TV band following the incentive auction continues in 2019, and repacked stations have a host of deadlines to meet – and requirements to file status reports on a quarterly basis. These are among the few dates not frozen by the government shutdown, and all auction-related costs are funded out of auction proceeds not the regular government funds over which the budget battle is now being waged

For radio, June begins another cycle of license renewal applications. Stations in Maryland, Virginia, West Virginia and the District of Columbia will file their renewal applications by June 1, preceded by two month’s announcements of the upcoming deadlines on the first and 16th of each month. Stations in the Carolinas follow two months later, with stations in other designated states to follow every other month until the 3-year cycle ends with the filing of renewals by radio stations in Pennsylvania and Delaware in 2022. TV stations will follow in the same cycle, one year behind radio. 2019 will also bring the requirement that all broadcast stations submit Biennial Ownership Reports by December 1. This will include noncommercial stations. TV broadcasters in certain states will also have obligations to submit to the FCC EEO Mid-Term Reports before that obligation is likely phased out by the FCC.

¹ This calendar is intended to be a useful reference guide to important deadlines, but is not intended to be an exhaustive list of required filings and will not be updated throughout the year. Filing requirements may change over the year, and new filing requirements may be adopted.

For radio broadcasters who stream their programming on the Internet, there are required payment and reporting obligations for their music use. While an appeal of the rates set in late 2015 for SoundExchange royalties is still pending and likely to be decided in 2019, the obligations to make upfront payments in January, and to file monthly Statements of Account and Reports of Use each month, remain. The start of the proceeding to set these rates for 2021-2025 will begin this year, with the filing by interested parties of petitions to participate in the Copyright Royalty Board's proceeding to set rates due by February 4. Stations also have obligations to pay ASCAP, BMI, and SESAC, and the newest performing rights organization, GMR. The Radio Music License Committee has entered into an Interim License Agreement with GMR. We suggest that you review your agreements with these organizations to make sure you meet all required payment and reporting deadlines. Also, watch for new announcements about BMI, as the RMLC and BMI are currently engaged in litigation over new rates.

To help keep track of many of the more general 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 that 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.

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 broadcasters have an online public file obligation, and they must ensure that the required documentation (such as the annual EEO public inspection file report or quarterly issues/programs lists) is uploaded by the applicable deadline to the station's FCC-hosted online public file. The online public file makes all of these deadlines even more important, particularly with the upcoming license renewals, as interested parties (including the FCC) need no longer come to your station to review whether you have met your public file obligations. Instead, they can review it anywhere there is an Internet connection (assuming that the government is open and the public file database is operating) and assess your compliance with the various public file obligations.

While 2019 is not a big political year, there are local elections in many states. There are also likely to be the occasional special election to fill vacated seats in various elective bodies. Moreover, we have already seen a number of candidates for President in 2020 declare their intention to run. With primaries early in 2020, the lowest unit charge period for the earliest of primaries begins late in 2019. In addition, we expect political election spending to begin in

crucial primary states much earlier in 2019. Remember that lowest unit charges must be extended to any political candidate (federal, state or local) 45 days before any primary and 60 days before any general election. While stations do not have an obligation to sell time to candidates for state and local races, once they decide to do so, all other political obligations arise. Federal candidates, like those running for president, have equal opportunity and reasonable access rights even outside the political windows. And all political sales, including issue advertising, triggers public file obligations.

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 or 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 2019.

With that background, some important dates for 2019 are set out in the calendar that follows.

**2019 BROADCASTERS'
CALENDAR**

JANUARY 2019

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 10, 2019¹	Records showing compliance with commercial limits on Children’s Television Programming during Q4-2018 must be included in stations’ online public files.	Stations’ Public Inspection Files	Commercial Full-Power and Class A Television Stations
	Issues/Programs Lists for Q4-2018 must be included 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 included in stations’ public inspection files. ²	Stations’ Public Inspection Files	Class A Television Stations
	FCC Form 387 Transition Progress Report	FCC; Stations’ Public Inspection Files	Commercial Full-Power and Class A Television Stations Moving to a New Channel During the Repack
	Children’s Television Programming Reports for Q4-2018 must be filed with the FCC and included in stations’ public inspection files. ³	FCC; Stations’ Public Inspection Files	Commercial Full-Power and Class A Television Stations

JANUARY 2019

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 14, 2019	For songs streamed during the month ending Nov. 30, 2018 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ⁴
January 31, 2019	Copyright Royalty Fee: Annual, nonrefundable minimum fee of \$500 for each channel and station.*	SoundExchange	Webcasters ³

FEBRUARY 2019

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?
<p style="text-align: center;">February 1, 2019</p>	<p style="text-align: center;">Annual EEO Public File Reports must be included in stations' public inspection files.</p>	<p style="text-align: center;">Stations' Public Inspection File</p>	<p>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 Unit⁵ with 5 or more full-time employees</p>
	<p style="text-align: center;">Broadcast Mid-Term Report (FCC Form 397).⁶</p>	<p style="text-align: center;">FCC; Stations' Public Inspection Files</p>	<p style="text-align: center;">Television Employment Units with five or more full-time employees in New Jersey or New York</p>
<p style="text-align: center;">February 14, 2019</p>	<p style="text-align: center;">For songs streamed during the month ending Dec. 31, 2018 —</p> <p style="text-align: center;">(1) Reports of Use containing information about songs streamed; and</p> <p style="text-align: center;">(2) Monthly royalty fee</p>	<p style="text-align: center;">SoundExchange</p>	<p style="text-align: center;">Webcasters³</p>

MARCH 2019

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?
<p>March 17, 2019</p>	<p>For songs streamed during the month ending Jan. 31, 2019 —</p> <p>(1) Reports of Use containing information about songs streamed; and</p> <p>(2) Monthly royalty fee</p>	<p>SoundExchange</p>	<p>Webcasters³</p>
<p>March 31, 2019</p>	<p>Broadcast EEO 1 Report (EEOC Form 100) Based on Employment Data from October, November or December 2018</p>	<p>Equal Employment Opportunity Commission</p>	<p>Private Employer's with 100 or more Employees</p>

APRIL 2019

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, 2019 ⁷	Airing of License Renewal Pre-Filing Announcements (first of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in in District of Columbia, Maryland, Virginia or West Virginia
	Annual EEO Public File Reports must be included 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 ⁴ with 5 or more full-time employees
	Broadcast Mid-Term Report (FCC Form 397). ⁵	FCC; Stations' Public Inspection Files	Television Employment Units with five or more full-time employees in Delaware or Pennsylvania
	Records showing compliance with commercial limits on Children's Television Programming during Q1-2019 must be included in stations' public inspection files.	Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations

APRIL 2019

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 10, 2019	Issues/Programs Lists for Q1-2019 must be included 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 included in stations' public inspection files. ¹	Stations' Public Inspection Files	Class A Television Stations
	Children's Television Programming Reports for Q1-2019 must be filed with the FCC and included in stations' public inspection files. ²	FCC; Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations
	FCC Form 387 Transition Progress Report for Period Providing information regarding steps taken from January 1, 2019 through March 31, 2019 to Construct Facilities	FCC; Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations Moving to a New Channel During the Repack
April 12, 2019	Phase 2 Post-Auction Repack Transition Termination Date		Stations Assigned to Transition Phase 2
April 13, 2019	Phase 3 Post-Auction repack Transition Testing Commencement		Stations Assigned to Transition Phase 3

APRIL 2019

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, 2019	<p style="text-align: center;">For songs streamed during the month ending Feb. 28, 2019 —</p> <p style="text-align: center;">(1) Reports of Use containing information about songs streamed; and</p> <p style="text-align: center;">(2) Monthly royalty fee</p>	SoundExchange	Webcasters ³
April 16, 2019	Airing of License Renewal Pre-Filing Announcements (second of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in the District of Columbia, Maryland, Virginia or West Virginia

MAY 2019

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, 2019	Airing of License Renewal Pre-Filing Announcements (third of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in the District of Columbia, Maryland, Virginia or West Virginia
May 15, 2019	For songs streamed during the month ending Mar. 31, 2019 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ³
May 16, 2019	Airing of License Renewal Pre-Filing Announcements (last of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in the District of Columbia, Maryland, Virginia or West Virginia

JUNE 2019

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, 2019	Broadcast Renewal Application (Form 303-S; Along With Equal Opportunity Employment Reports (Form 396)	FCC; Stations' Public Inspection File	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in the District of Columbia, Maryland, Virginia, or West Virginia ⁸
	Airing of License Renewal Post-Filing Announcements (first of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in the District of Columbia, Maryland, Virginia, or West Virginia ⁹
	Airing of License Renewal Pre-Filing Announcements (first of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in North Carolina and South Carolina
June 14, 2019	Annual EEO Public File Reports must be included 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 ⁴ with 5 or more full-time employees

JUNE 2019

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?
	<p>For songs streamed during the month ending Apr. 30, 2019 —</p> <p>(1) Reports of Use containing information about songs streamed; and</p> <p>(2) Monthly royalty fee</p>	SoundExchange	Webcasters ³
June 16, 2019	Airing of License Renewal Post-Filing Announcements (second of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in the District of Columbia, Maryland, Virginia, or West Virginia ¹⁰
June 21, 2019	Airing of License Renewal Pre-Filing Announcements (second of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in in North Carolina and South Carolina
	Phase 3 Post-Auction Repack Transition Termination	Stations' Public Inspection File	Stations' Assigned to Transition Phase 3
June 22, 2019	Phase 4 Post-Auction Repack Transition Testing	Stations' Public Inspection File	Stations' Assigned to Transition Phase 4

JULY 2019

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 10, 2019	Airing of License Renewal Pre-Filing Announcements (third of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations radio stations in North Carolina and South Carolina
	Records showing compliance with commercial limits on Children's Television Programming during Q2-2019 must be included in stations' public inspection files.	Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations
	Issues/Programs Lists for Q2-2019 must be included 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 included in stations' public inspection files. ¹	Stations' Public Inspection Files	Class A Television Stations
	Children's Television Programming Reports for Q2-2019 must be filed with the FCC and included in stations' public inspection files. ²	FCC; Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations
	FCC Form 387 Transition Progress Report for Period Providing information regarding steps taken from April 1, 2019 through June 30, 2019 to Construct Facilities	FCC; Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations

JULY 2019

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 15, 2019	<p>For songs streamed during the month ending May 31, 2019 —</p> <p>(1) Reports of Use containing information about songs streamed; and</p> <p>(2) Monthly royalty fee</p>	SoundExchange	Webcasters ³
July 16, 2019	Airing of License Renewal Post-Filing Announcements (fourth of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in the District of Columbia, Maryland, Virginia, or West Virginia ¹¹
	Airing of License Renewal Pre-Filing Announcements (final of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in North Carolina and South Carolina
July 31, 2019 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 2019

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, 2019	Broadcast Renewal of License (FCC Form 303-S), along with Equal Opportunity Employment Report (FCC Form 396)	FCC; Stations' Public Inspection File	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in North Carolina and South Carolina
	Airing of License Renewal Post-Filing Renewal Announcements (first of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in North Carolina and South Carolina ¹⁴
	Airing of License Renewal Post-Filing Announcements (fifth of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations the District of Columbia, Maryland, Virginia, or West Virginia ¹⁵
	Annual EEO Public File Reports must be included 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 ⁴ with five or more full-time employees

AUGUST 2019

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 2, 2019	Airing of License Renewal Pre-Filing Renewal Announcements (first of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Florida, Puerto Rico, or the Virgin Islands
	Phase 4 Post-Auction Repack Transition Termination		Stations' in Phase 4
August 3, 2019	Phase 5 Post-Auction Repack Transition Commencement		Stations' in Phase 5
August 14, 2019	For songs streamed during the month ending June 30, 2019 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ³
August 16, 2019	Airing of License Renewal Post-Filing Announcements (final of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in the District of Columbia, Maryland, Virginia, or West Virginia ¹⁶
	Airing of License Renewal Post-Filing Renewal Announcements (second of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in North Carolina and South Carolina ¹⁷

AUGUST 2019

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?
	Airing of License Renewal Pre-Filing Renewal Announcements (second of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Florida, Puerto Rico, or the Virgin Islands

SEPTEMBER 2019

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 1, 2019	Airing of License Renewal Post-Filing Announcements (final of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in the District of Columbia, Maryland, Virginia, or West Virginia ¹⁸
	Airing of License Renewal Post-Filing Renewal Announcements (third of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in North Carolina and South Carolina ¹⁹
	Airing of License Renewal Pre-Filing Renewal Announcements (third of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Florida, Puerto Rico, or the Virgin Islands
September 2019 (day TBD) ²⁰	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 6, 2019	Phase 5 post-Auction Repack Transition Termination	Stations' Public Inspection File	Stations in Transition Phase 5
September 7, 2019	Phase 6 Post-Auction Repack Transition	Stations' Public Inspection File	Stations in Transition Phase 6

SEPTEMBER 2019

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 14, 2019	For songs streamed during the month ending July 31, 2019 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ³
September 16, 2019	Airing of License Renewal Post-Filing Renewal Announcements (fourth of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations North Carolina and South Carolina ²¹
	Airing of License Renewal Pre-Filing Renewal Announcements (final of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Florida, Puerto Rico, or the Virgin Islands

OCTOBER 2019

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, 2019	Annual EEO Public File Reports must be included 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
	Broadcast Renewal Applications (FCC Form 303-S) along with Equal Opportunity Employment Reports (FCC Form 396)	FCC; Stations' Public Inspection Files	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Florida, Puerto Rico and the Virgin Islands.
	Airing of License Renewal Post-Filing Renewal Announcements (first of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Florida, Puerto Rico and the Virgin Islands
	Airing of License Renewal Pre-Filing Renewal Announcements (first of the required four announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Alabama and Georgia

OCTOBER 2019

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, 2019	Airing of License Renewal Post-Filing Renewal Announcements (fifth of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in North Carolina and South Carolina ²²
	Records showing compliance with commercial limits on Children's Television Programming during Q3-2019 must be included in stations' public inspection files.	Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations
	Issues/Programs Lists for Q3-2019 must be included 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
	Children's Television Programming Reports for Q3-2019 must be filed with the FCC and included in stations' public inspection files. ²	FCC; Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations
	Documentation of Class A Television Continuing Eligibility should be included in stations' public inspection files. ¹	Stations' Public Inspection Files	Class A Television Stations

OCTOBER 2019

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 15, 2019	FCC Form 387 Transition Progress Report for Period Providing information regarding steps taken from July 1, 2019 through September 30, 2019 to Construct Facilities	FCC; Stations' Public Inspection Files	Commercial Full-Power and Class A Television Stations
	For songs streamed during the month ending Aug. 31, 2019 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ³
October 16, 2019	Airing of License Renewal Post-Filing Renewal Announcements (final of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in North Carolina and South Carolina ²³
	Airing of License Renewal Post-Filing Renewal Announcements (second of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Florida, Puerto Rico and the Virgin Islands
	Airing of License Renewal Pre-Filing Renewal Announcements (second of the required four announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Alabama and Georgia

OCTOBER 2019

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 18, 2019	Phase 6 Post-Auction Repack Transition Termination	Stations Public Inspection File	Stations assigned to Transition Phase 6
October 19, 2019	Phase 7 Post-Auction Repack Transition Testing	Stations' Public Inspection File	Stations assigned to Transition Phase 7

NOVEMBER 2019

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 1, 2019	Airing of License Renewal Post-Filing Renewal Announcements (third of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Florida, Puerto Rico and the Virgin Islands
	Airing of License Renewal Pre-Filing Renewal Announcements (third of the required four announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Alabama and Georgia
November 14, 2019	For songs streamed during the month ending Sept. 30, 2019 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ³
November 16, 2019	Airing of License Renewal Post-Filing Renewal Announcements (fourth of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Florida, Puerto Rico and the Virgin Islands
	Airing of License Renewal Pre-Filing Renewal Announcements (final of the required four announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Alabama and Georgia

DECEMBER 2019

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, 2019	Airing of License Renewal Post-Filing Renewal Announcements (fifth of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Florida, Puerto Rico and the Virgin Islands
	Annual EEO Public File Reports must be included 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 ⁴ with 5 or more full-time employees
	Biennial Ownership Reports (FCC Form 323 or 323-E) must be filed and included in stations' public inspection files.	FCC; Stations' Public Inspection Files	All Commercial and Noncommercial Radio and Television Stations, including LPTV and Class A stations
	Broadcast Renewal Applications (FCC Form 303-S) along with Equal Opportunity Employment Reports (FCC Form 396)	FCC; Stations' Public Inspection File	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Alabama and Georgia

DECEMBER 2019

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, 2019	Airing of License Renewal Post-Filing Renewal Announcements (first of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Alabama and Georgia
	Airing of License Renewal Pre-Filing Renewal Announcements (first of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Arkansas, Louisiana, and Mississippi
	Annual DTV Ancillary/Supplementary Services Report (former FCC Form 317, now known as FCC Form 2100, Schedule G) must be filed.	FCC	Commercial and Noncommercial Full-Power and Digital Class A Television Stations, Digital TV Translators, and Digital LPTV Stations that have fee-based non-broadcast revenues from their digital transmission capabilities ²⁴
December 15, 2019	For songs streamed during the month ending Oct. 31, 2019 — (1) Reports of Use containing information about songs streamed; and (2) Monthly royalty fee	SoundExchange	Webcasters ³
December 16, 2019	Airing of License Renewal Post-Filing Renewal Announcements (final of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Florida, Puerto Rico and the Virgin Islands

DECEMBER 2019

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?
	Airing of License Renewal Pre-Filing Renewal Announcements (second of the required four pre-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Arkansas, Louisiana, and Mississippi
	Airing of License Renewal Post-Filing Renewal Announcements (second of the required six post-filing announcements)	N/A	Commercial and Noncommercial Full-Power AM, FM, FM Translators Radio stations in Alabama and Georgia
December 20, 2019	Lowest Unit Rate Window Opens	N/A	The first date of the Lowest Unit Rate Period for the presidential primaries and caucuses to be held in Iowa on February 3, 2020.
December 28, 2019	Lowest Unit Rate Window Opens	N/A	The first date of the Lowest Unit Rate Period for the presidential primaries and caucuses to be held in New Hampshire on February 11, 2020

ENDNOTES

¹ Note that, because of the government shutdown, the dates to comply with the obligations involving the online public file, and the filing of Quarterly Children’s Television reports, were extended. FCC filings, like the Quarterly Children’s Television Report, are now due February 8. Public file obligations that arose during the shutdown, like the Quarterly Issues Programs Lists, are now due to be included in the public file by February 11, 2019. The Transition Progress Report, however, being auction related, should have been filed on time as auction and related repacking deadlines were unaffected by the shutdown.

² 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.

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. Note, station employees should check from time to time to make sure that the FCC has in fact uploaded these documents to their online public file.

⁴ This includes radio stations that simulcast their programming on the Internet.

⁵ 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.

⁶ Note that the FCC is likely to abolish the requirement for the filing of an FCC Form 397 – but that action will be effective after the filings by TV stations this year. TV stations do not have to place these forms in their public inspection files. Instead, the FCC is expected to upload each station’s electronically filed form to its online public inspection file.

⁷ Because the April 1st deadline falls on a weekend and these documents must be submitted to the FCC, the deadline is extended to the next business day, which is April 3rd.

⁸ This filing falls on a weekend; submission of these forms may be made on June 3.

⁹ FM Translator stations must arrange for the required newspaper public notice.

¹⁰ See note 9.

¹¹ See note 9.

¹² Claims for compensation from the 2018 cable and satellite royalty funds may be filed beginning in July 2019, but must be filed no later than July 31, 2019.

¹³ A television station may be eligible to receive compensation from the 2018 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 or as a distant signal on a direct-to-home satellite system.

¹⁴ Watch for announcements of this date by the Copyright Royalty Board, as this date may vary slightly, and the form to be used are currently subject to revision.

¹⁵ See note 9.

¹⁶ See note 9.

¹⁷ See note 9.

¹⁸ See note 9.

¹⁹ See note 9.

²⁰ 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.

²¹ See note 9.

²² See note 9.

²³ See note 9.

²⁴ 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.