
2020 Broadcasters' Calendar

A Note to Our Readers

The impact of the COVID-19 pandemic has been felt by every sector of the economy. Due to the unique challenges it poses to broadcasters, however, the FCC has made several changes to its filing deadlines and other obligations for broadcasters in 2020. In response, we are publishing this updated version of our 2020 Broadcasters' Calendar, reflecting changes announced by the FCC as of May 2020. The FCC may make additional changes going forward, so we encourage broadcasters to stay up to date, including by monitoring CommLawCenter.com, where Pillsbury's Communications attorneys are closely tracking the FCC's pandemic response.

Items of Note in 2020¹

- I. *Applications for Renewal of License: June 1, 2020* is the first filing deadline in the three-year long license renewal cycle for stations in the television services (full-power television, Class A, TV Translator, and LPTV). The renewal cycle for radio services (AM, FM, FM Translator, and LPFM), which began on June 1, 2019, continues into 2020. Stations will file their license renewal applications on FCC Form 2100, Schedule 303-S ("Form 303-S") along with their Equal Opportunity Employment Reports on Form 2100, Schedule 396 ("Form 396"). The date by which the licensee must file a station's application for license renewal depends on the state or territory of the station's community of license. All licensees should familiarize themselves now with the dates associated with this important filing, including the filing deadline itself (which is approximately four months before the date of license expiration), and the dates on which post-filing announcements must air. *Note that the FCC has waived the pre-filing announcement requirement for radio and TV stations scheduled to file their license renewal applications by June 1 or later until its new rules permanently eliminating pre-filing announcements go into effect. These rule changes also modify*

¹ The deadlines in the **2020 Broadcasters' Calendar** are based on information known as of the date hereof and may or may not apply to any particular broadcaster. They are provided for general informational purposes only and should be double-checked for currency close to each pertinent date/deadline. Actions by the FCC, Congress, or the courts could affect any of these deadlines by, for example, eliminating a particular reporting/filing obligation altogether or modifying the form used, content, deadline, fee, or manner of reporting/filing. It should also be noted that, as a general rule, when a deadline for filing a document with the FCC falls on a weekend or a federal holiday, the filing deadline shifts to the next business day. The listing below is not intended to be complete or exhaustive of all regulatory and non-regulatory deadlines that may apply to a given broadcaster year-to-year. Accordingly, broadcasters should seek the advice of communications counsel to assure timely and proper filing. This edition of our annual Broadcasters' Calendar supersedes all prior editions and accordingly any prior editions should no longer be used.

the post-filing notice requirement, replacing the required newspaper publication with an online notice. The revised local public notice rules are subject to Office of Management and Budget (“OMB”) review and will go into effect following OMB approval.

- II. Commercial and Noncommercial Biennial Ownership Reports: January 31, 2020** is the deadline by which licensees of commercial and noncommercial radio and television stations, as well as entities with attributable interests in such stations, must file their biennial ownership reports. Commercial stations will file FCC Form 2100, Schedule 323 (“Form 323”), and noncommercial stations will file FCC Form 2100, Schedule 323-E (“Form 323-E”). The filing deadline was extended from the original filing deadline of December 2, 2019 to allow the FCC to implement technical improvements to the Form 323/323-E report in the FCC’s Licensing and Management System (“LMS”). This cycle’s filing window opened November 1, 2019, and the information in all ownership reports must be accurate as of October 1, 2019.
- III. TV Spectrum Repack Filing Deadlines:** TV stations transitioning to a new channel in the spectrum repack have been assigned to one of ten successive transition phases, each with its own timeline governing when the station may begin testing on its new channel and when it must cease operations on its pre-auction channel. Since late 2017, all full-power and Class A television stations that are being repacked have been required to file FCC Form 2100, Schedule 387 (“Form 387”) by the tenth day following each calendar quarter. These Transition Progress Reports detail a station’s current progress in constructing facilities for its new channel and ending operations on its current channel. This reporting requirement continues until the station has finished its transition and has filed a final report indicating that fact. In addition to these quarterly reports, transitioning stations must file Transition Progress Reports ten weeks before the end of their assigned construction deadline, ten days after completion of all work related to constructing their post-repack facilities, and five days after ceasing operations on their pre-auction channel. The FCC has also established several other important repack-related deadlines; more information about the specific transition phases and related deadlines can be found in [our CommLawCenter article on the subject](#).
- IV. Children’s Television Programming Report:** Full-power and Class A television stations are no longer required to file their Children’s Television Programming Reports on a quarterly basis, and instead will be required to file them annually within 30 days of the end of each calendar year. However, to allow time for the FCC to revise its reporting form and for stations to familiarize themselves with that form, the FCC announced that the first annual Report, covering the period September 16, 2019 through December 31, 2019, will not be due until **July 10, 2020**. *Note that the FCC extended the filing deadline from March 30 to July 10 to allow stations additional time in light of challenges caused by the COVID-19 pandemic.*
- V. Certifications of Compliance with Children’s Television Commercial Limits:** Effective January 21, 2020, full-power and Class A television stations will no longer be required to place in their Public Inspection File documentation of compliance with the commercial limits in children’s television programming on a quarterly basis, and will instead be required to do so annually. Because that change has not yet gone into effect, stations must place a final quarterly commercial limits certification in their Public Inspection File by **January 10, 2020**. The first *annual* commercial limits certification will be due by **January 30, 2021**.
- VI. “Lowest Unit Charge” Periods for Political Advertisements:** Legally qualified candidates purchasing broadcast time are entitled to the “lowest unit charge” for such ad time during the 45 days before a primary or primary runoff election and during the 60 days before a general election. During these

“lowest unit charge” periods, broadcast stations must make advertising time available to legally qualified candidates at no more than their “lowest unit charge” for the same class of advertisement (i.e., length of spot, risk of preemption, daypart). Stations should monitor primary and general election dates in 2020 to ensure compliance with this requirement. Many of these dates are available in our monthly *Pillsbury Antenna* publication, available to email subscribers of CommLawCenter.com.

- VII.** *FM Broadcast Auction:* The FCC will commence an auction of certain FM broadcast station construction permits beginning on **April 28, 2020**. Those interested in participating in the auction should familiarize themselves with the list of 130 available FM station construction permits, as well as the dates and deadlines that apply to auction participants. Additional information on the FM Broadcast Auction [can be found in our CommLawCenter article on the subject](#). *Note that the FCC postponed this auction indefinitely due to the COVID-19 pandemic. The FCC announced that a future public notice will provide details on the revised auction schedule.*

January 10

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must place in their Public Inspection File by this date the Quarterly Issues/Programs List covering the period October 1, 2019 through December 31, 2019.

Certification of Children's Commercial Time Limitations Due—Commercial full-power and Class A television stations must place in their Public Inspection File by this date records "sufficient to verify compliance" with the FCC's commercial time limitations in children's programming broadcast during the period October 1, 2019 through December 31, 2019. *Note that the FCC has modified the certification timetable, adopting an annual, rather than quarterly, certification requirement. As a result, following this January 10, 2020 submission, the next Commercial Time Limitations certification will not be due until January 30, 2021. See Item of Note V above for additional information.*

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their Public Inspection File sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period October 1, 2019 through December 31, 2019 and place it in their Public Inspection File.

Quarterly Transition Progress Reports—Full-power and Class A television stations moving to a new channel during the repack that have not yet completed their transition and/or have not filed their final transition report, must file a Form 387 Transition Progress Report providing information regarding the steps taken during the period October 1, 2019 through December 31, 2019 to construct facilities for their new channel and end operations on their current channel. This reporting requirement applies regardless of whether a station is eligible for reimbursement. *Note that the FCC has waived the filing of the January 10, 2020 Quarterly Report for Phase 8 stations, owing to this due date's proximity with the January 3 deadline for these stations to file their 10-Week Report.*

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period October 1, 2019 through December 31, 2019 and place it in their Public Inspection File by this date.

January 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending November 30, 2019 by this date.

January 17

Phase 7 Post-Auction Repack Transition Termination Date—Stations assigned to Transition Phase 7 must cease operating on their pre-auction channel by this date. See *Item of Note III above for additional information.*

January 18

Phase 8 Post-Auction Repack Transition Testing Commencement Date—Transition Phase 8 testing begins. See *Item of Note III above for additional information.*

January 31

Commercial and Noncommercial Biennial Ownership Reports Due—Commercial stations are required to file Form 323 (Ownership Report for Commercial Broadcast Stations) and noncommercial stations must file Form 323-E (Ownership Report for Noncommercial Broadcast Stations) by this date. All reports must be accurate as of October 1, 2019. In cases where a broadcast station is sold between October 1, 2019 and the filing date, a biennial ownership report must be filed by the party that owned the station as of October 1, 2019.

Copyright Royalty Fee: Annual Minimum Fee Statement of Account Form Due—By this date, most commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet **must submit the Minimum Fee Statement of Account Form** and the annual copyright royalty fee to SoundExchange. January 31 is also the date by which certain webcasters and those broadcast stations simulcasting their programming over the Internet are eligible to make elections affecting their royalty rates and reporting requirements for the upcoming year. If your radio station is simulcast or rebroadcast over the Internet, we encourage you to consult qualified counsel with regard to your obligations.

Amendments to Pending Applications for New Rural Digital Low Power TV and TV Translators Due—The filing window to amend applications for new rural digital low power and TV translator stations displaced by the Incentive Auction and station repack process, which opened December 2, 2019, will close on this date.

February 1

Filing of Applications for Renewal of Licenses for Radio Stations—AM, FM, FM Translator, and LPFM stations licensed to communities in **Arkansas, Louisiana, or Mississippi** must file by this date their applications for renewal of license on Form 303-S, along with their Equal Opportunity Employment Reports on Form 396, and commercial stations must promptly submit their FCC license renewal application filing fee. ***Note that because this filing deadline falls on a weekend, submission of this item to the FCC may be made on February 3.***

Post-filing License Renewal Announcements for Radio Stations—Full-power AM and FM radio stations, as well as **LPFM stations**, licensed to communities in **Arkansas, Louisiana, or Mississippi** must begin on this date to air their post-filing license renewal announcements in accordance with the FCC's regulations. **FM Translator stations** licensed to communities in these jurisdictions must arrange for the required public notice of their license renewal application filing.

Pre-filing License Renewal Announcements for Radio Stations—Full-power AM and FM radio stations and LPFM stations licensed to communities in **Indiana, Kentucky, or Tennessee** must on this date begin to air their pre-filing license renewal announcements in accordance with the FCC's regulations.

Annual EEO Public File Report Due—Station Employment Units that have five or more full-time employees and are comprised of **radio and/or television stations** licensed to communities in **Arkansas, Kansas, Louisiana, Mississippi, Nebraska, New Jersey, New York, or Oklahoma** must by this date place in their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period February 1, 2019 through January 31, 2020. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

February 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending December 31, 2019 by this date.

March 13

Phase 8 Post-Auction Repack Transition Termination Date—Stations assigned to Transition Phase 8 must cease operating on their pre-auction channel by this date. See *Item of Note III above for additional information*.

March 14

Phase 9 Post-Auction Repack Transition Testing Commencement Date—Transition Phase 9 testing begins. See *Item of Note III above for additional information*.

March 16

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending January 31, 2020 by this date.

March 31

EEO 1 Report Due—Broadcasters that are subject to the federal Equal Employment Opportunity Commission's (EEOC) reporting requirements must file their EEO 1 Report (Form 100) by this date. Private employers that have 100 or more employees at a single establishment or collectively have 100 or more employees at multiple establishments, as well as certain federal contractors, are generally subject to this requirement and must complete the report based on employment data from a single pay

period during October, November, or December 2019. We encourage you to consult with counsel on the filing and visit <https://www.eeoc.gov/employers/eeo-reports-surveys> for additional background. *Note that, due to the COVID-19 pandemic, the EEOC has delayed the deadline for filing the 2019 EEO 1 survey to 2021. The new deadline will be announced on the EEOC's website and notification will be sent to eligible filers.*

April 1

Filing of Applications for Renewal of Licenses for Radio Stations—AM, FM, FM Translator, and LPFM stations licensed to communities in **Indiana, Kentucky, or Tennessee** must file by this date their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396, and commercial stations must promptly submit their FCC license renewal application filing fee.

Post-filing License Renewal Announcements for Radio Stations—Full-power AM and FM radio stations, as well as **LPFM stations**, licensed to communities in **Indiana, Kentucky, or Tennessee** must begin on this date to air their post-filing license renewal announcements in accordance with the FCC's regulations. **FM Translator stations** licensed to communities in these jurisdictions must arrange for the required public notice of their license renewal application filing. *See Item of Note 1 above for additional information.*

Pre-filing License Renewal Announcements for Radio and Television Stations—This is the date by which **full-power AM and FM radio stations**, as well as **LPFM stations**, licensed to communities in **Michigan or Ohio**, and **full-power and Class A television stations**, as well as **LPTV stations capable of local origination**, licensed to communities in **the District of Columbia, Maryland, Virginia, or West Virginia**, would normally begin airing their pre-filing license renewal announcements. However, the FCC has waived the pre-filing announcement requirement for all license renewal applications due June 1, 2020 or later. *See Item of Note 1 above for additional information.*

Annual EEO Public File Report Due—Station Employment Units that have five or more full-time employees and are comprised of **radio and/or television stations** licensed to communities in **Delaware, Indiana, Kentucky, Pennsylvania, Tennessee, or Texas** must by this date place in their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period April 1, 2019 through March 31, 2020. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

April 10

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must normally place in their Public Inspection File by this date the Quarterly Issues/Programs List covering the period January 1, 2020 through March 31, 2020. *However, note that the FCC extended the deadline for uploading the First Quarter Issues/Program List to July 10, 2020 as a result of the COVID-19 pandemic. Additional information on the FCC's deadline extensions in response to the pandemic can be found in our [CommLawCenter article on the subject](#).*

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their Public Inspection File sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period January 1, 2020 through March 31, 2020 and place it in their Public Inspection File.

Quarterly Transition Progress Reports—Full-power and Class A television stations moving to a new channel during the repack that have not yet completed their transition and/or have not filed their final transition report, must file a Form 387 Transition Progress Report providing information regarding the steps taken during the period January 1, 2020 through March 31, 2020 to construct facilities for their new channel and end operations on their current channel. This reporting requirement applies regardless of whether a station is eligible for reimbursement.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period January 1, 2020 through March 31, 2020 and place it in their Public Inspection File by this date.

April 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending February 29, 2020 by this date.

April 28

Full-power FM Broadcast Auction—Beginning on this date, the FCC will hold an auction of 130 new full-power FM broadcast station construction permits. *See Item of Note VII above for additional information on the auction, including details on its postponement due to the COVID-19 pandemic.*

May 1

Phase 9 Post-Auction Repack Transition Termination Date—Stations assigned to Transition Phase 9 must cease operating on their pre-auction channel by this date. *See Item of Note III above for additional information. Note the FCC will grant waivers for Phase 9 stations unable to complete the transition to their post-auction channel by the May 1 deadline as a result of circumstances related to the COVID-19 pandemic. Stations granted a waiver will be reassigned to Phase 10.*

May 2

Phase 10 Post-Auction Repack Transition Testing Commencement Date—Transition Phase 10 testing begins. *See Item of Note III above for additional information.*

May 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending March 31, 2020 by this date.

June 1

Filing of Applications for Renewal of Licenses for Radio and Television Stations—Full-power AM and FM radio stations, as well as **LPFM and FM Translator stations**, licensed to communities in **Michigan or Ohio**, and **full-power television, Class A, LPTV, and TV Translator stations** licensed to

communities in **the District of Columbia, Maryland, Virginia, or West Virginia**, must file by this date their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396, and commercial stations must promptly submit their FCC license renewal application filing fee.

Post-filing License Renewal Announcements for Radio and Television Stations—Full-power AM and FM radio stations, as well as **LPFM stations**, licensed to communities in **Michigan or Ohio**, and **full-power television stations and Class A television stations**, as well as **LPTV stations capable of local origination**, licensed to communities in the **District of Columbia, Maryland, Virginia, or West Virginia**, must begin on this date to air their post-filing license renewal announcements in accordance with the FCC's regulations. **FM Translator and TV Translator stations**, as well as **LPTV stations not capable of local origination**, licensed to communities in these jurisdictions must arrange for the required public notice of their license renewal application filing. *See Item of Note I above for additional information.*

Pre-filing License Renewal Announcements for Radio and Television Stations—This is the date by which **full-power AM and FM radio stations**, as well as **LPFM stations**, licensed to communities in **Illinois or Wisconsin**, and **full-power and Class A television stations**, as well as **LPTV stations capable of local origination**, licensed to communities in **North Carolina or South Carolina**, would normally begin airing their pre-filing license renewal announcements. However, the FCC has waived the pre-filing announcement requirement for all license renewal applications due June 1, 2020 or later. *See Item of Note I above for additional information.*

Annual EEO Public File Report Due—Station Employment Units that have five or more full-time employees and are comprised of **radio and/or television stations** licensed to communities in **Arizona, the District of Columbia, Idaho, Maryland, Michigan, Nevada, New Mexico, Ohio, Utah, Virginia, West Virginia, or Wyoming** must by this date place in their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period June 1, 2019 through May 31, 2020. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

June 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending April 30, 2020 by this date.

July 3

Phase 10 Post-Auction Repack Transition Termination Date—Stations assigned to Transition Phase 10 must cease operating on their pre-auction channel by this date. *See Item of Note III above for additional information. Note July 3 is also the deadline for Phase 9 stations that were granted a waiver of the May 1 deadline to complete the transition to their post-auction channel.*

July 10

Annual Children's Television Programming Report Due—Commercial full-power and Class A television stations must by this date file FCC Form 2100, Schedule H (formerly FCC Form 398) demonstrating their responsiveness to "the educational and informational needs of children" for the period September 16, 2019 through December 31, 2019. *See Item of Note IV above for additional information.*

Note that the FCC extended the original March 30, 2020 deadline for the Annual Children's Television Programming Report to July 10, 2020 as a result of the COVID-19 pandemic. Additional information on the FCC's deadline extensions in response to the pandemic can be found in our [CommLawCenter article on the subject](#).

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must place in their Public Inspection File by this date the Quarterly Issues/Programs Lists covering the periods January 1, 2020 through March 31, 2020, and April 1, 2020 through June 30, 2020. *Note that the FCC extended the deadline for uploading the First Quarter Issues/Program List as a result of the COVID-19 pandemic. Additional information on the FCC's deadline extensions in response to the pandemic can be found in our [CommLawCenter article on the subject](#).*

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their Public Inspection File sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period April 1, 2020 through June 30, 2020 and place it in their Public Inspection File.

Quarterly Transition Progress Reports—Full-power and Class A television stations moving to a new channel during the repack that have not yet completed their transition and/or have not filed their final transition report, must file a Form 387 Transition Progress Report providing information regarding the steps taken during the period April 1, 2020 through June 30, 2020 to construct facilities for their new channel and end operations on their current channel. This reporting requirement applies regardless of whether a station is eligible for reimbursement.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period April 1, 2020 through June 30, 2020 and place it in their Public Inspection File by this date.

July 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending May 31, 2020 by this date.

July 31

Copyright Royalty Claims Due—Television stations with locally-produced programming whose signals were carried as distant signals by at least one cable or satellite system in 2019 are eligible to file royalty claims for compensation with the Copyright Office in Washington, DC by this date. Under the federal Copyright Act, cable systems and satellite operators must pay "compulsory license" royalties to carry distant TV signals on their systems. The royalties are used to compensate the owners of copyrighted works broadcast on those signals. Stations that do not file claims by the deadline will not be able to collect royalties for distant carriage of their signals during 2019.

Carriage Election Notification Point of Contact Information Due—Full power commercial and noncommercial television stations must by this date place in their online Public Inspection File both an email address and a telephone number for the receipt of electronic carriage-related notifications. Qualified LPTV and NCE translator stations must update their contact information in the FCC's Licensing and Management System by this date as well, as MVPDs with carriage-related questions are entitled to rely on the contact information provided.

August 1

Regulatory Fees Announced—The FCC is expected to release a Public Notice this month indicating the date by which annual regulatory fees must be filed and the amounts of those fees. Broadcasters should watch for this announcement.

Filing of Applications for Renewal of Licenses for Radio and Television Stations—Full-power AM and FM radio stations, as well as **LPFM and FM Translator stations**, licensed to communities in **Illinois or Wisconsin**, and **full-power television, Class A, LPTV and TV Translator stations** licensed to communities in **North Carolina or South Carolina**, must file by this date their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396 by this date, and commercial stations must promptly submit their FCC license renewal application filing fee. **Note that because this filing deadline falls on a weekend, submission of this item to the FCC may be made on August 3.**

Post-filing License Renewal Announcements for Radio and Television Stations—Full-power AM and FM radio stations, as well as **LPFM stations**, licensed to communities in **Illinois or Wisconsin**, and **full-power television stations and Class A television stations**, as well as **LPTV stations capable of local origination**, licensed to communities in **North Carolina or South Carolina**, must begin on this date to air their post-filing license renewal announcements in accordance with the FCC's regulations. **FM Translator and TV Translator stations**, as well as **LPTV stations not capable of local origination**, licensed to communities in these states must arrange for the required public notice of their license renewal application filing. *See Item of Note 1 above for additional information.*

Pre-filing License Renewal Announcements for Radio and Television Stations—This is the date by which **full-power AM and FM radio stations**, as well as **LPFM stations**, licensed to communities in **Iowa or Missouri**, and **full-power and Class A television stations**, as well as **LPTV stations capable of local origination**, licensed to communities in **Florida, Puerto Rico, or the Virgin Islands**, would normally begin airing their pre-filing license renewal announcements. However, the FCC has waived the pre-filing announcement requirement for all license renewal applications due June 1, 2020 or later. *See Item of Note 1 above for additional information.*

Annual EEO Public File Report Due—Station Employment Units that have five or more full-time employees and are comprised of **radio and/or television stations** licensed to communities in **California, Illinois, North Carolina, South Carolina, or Wisconsin** must by this date place in their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period August 1, 2019 through July 31, 2020. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

August 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their

programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending June 30, 2020 by this date.

September 4

“Lowest Unit Charge” Period Begins for November 3 Election—Beginning on this date, broadcast stations must make advertising time available to legally qualified candidates at no more than their “lowest unit charge” for the same class of advertisement. *See Item of Note VI above for additional information.*

September 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending July 31, 2020 by this date.

October 1

Must-Carry/Retransmission Consent Election—Commercial television stations with must-carry rights are required to elect either retransmission consent or mandatory carriage (must-carry) on local cable and satellite systems, and noncommercial television stations must make satellite carriage elections. By this date, stations required to maintain a Public Inspection File must place in that file their carriage election statement(s) providing notice of the station’s election. This election applies to the upcoming three-year carriage cycle (which begins on January 1, 2021) for commercial television stations, and applies indefinitely for noncommercial television stations. *Note that the FCC has revised its carriage election rules such that placement of election statements in a station’s Public Inspection File replaces the previous process of sending election notices to cable and satellite systems via certified mail. Qualified LPTV and NCE translator stations, neither of which are required to maintain a Public Inspection File, must by this date notify MVPDs of their elections by email.*

Filing of Applications for Renewal of Licenses for Radio and Television Stations—Full-power AM and FM radio stations, as well as **LPFM and FM Translator stations**, licensed to communities in **Iowa or Missouri**, and **full-power television, Class A, LPTV, and TV Translator stations** licensed to communities in **Florida, Puerto Rico, or the Virgin Islands**, must file by this date their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396, and commercial stations must promptly submit their FCC license renewal application filing fee.

Post-filing License Renewal Announcements for Radio Stations—Full-power AM and FM radio stations, as well as **LPFM stations**, licensed to communities in **Iowa or Missouri**, and **full-power and Class A television stations**, as well as **LPTV stations capable of local origination**, licensed to communities in **Florida, Puerto Rico, or the Virgin Islands**, must begin on this date to air their post-filing license renewal announcements in accordance with the FCC’s regulations. **FM Translator and TV Translator stations**, as well as **LPTV stations not capable of local origination**, licensed to communities in these jurisdictions must arrange for the required public notice of their license renewal application filing. *See Item of Note I above for additional information.*

Pre-filing License Renewal Announcements for Radio and Television Stations—This is the date by which **full-power AM and FM radio stations**, as well as **LPFM stations**, licensed to communities in **Colorado, Minnesota, Montana, North Dakota, or South Dakota**, and **full-power and Class A television stations**, as well as **LPTV stations capable of local origination**, licensed to communities in

Alabama or Georgia, would normally begin airing their pre-filing license renewal announcements. However, the FCC has waived the pre-filing announcement requirement for all license renewal applications due June 1, 2020 or later. *See Item of Note I above for additional information.*

Annual EEO Public File Report Due—Station Employment Units that have five or more full-time employees and are comprised of **radio and/or television stations** licensed to communities in **Alaska, American Samoa, Florida, Guam, Hawaii, Iowa, the Mariana Islands, Missouri, Oregon, Puerto Rico, Saipan, the Virgin Islands, or Washington** must by this date place in their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period October 1, 2019 through September 30, 2020. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

October 10

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must place in their Public Inspection File by this date the Quarterly Issues/Programs List covering the period July 1, 2020 through September 30, 2020.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their Public Inspection File sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period July 1, 2020 through September 30, 2020 and place it in their Public Inspection File.

Quarterly Transition Progress Reports—Full-power and Class A television stations moving to a new channel during the repack that have not yet completed their transition and/or have not filed their final transition report, must file a Form 387 Transition Progress Report providing information regarding the steps taken during the period July 1, 2020 through September 30, 2020 to construct facilities for their new channel and end operations on their current channel. This reporting requirement applies regardless of whether a station is eligible for reimbursement.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period July 1, 2020 through September 30, 2020 and place it in their Public Inspection File by this date.

October 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending August 31, 2020 by this date.

November 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending September 30, 2020 by this date.

December 1

Filing of Applications for Renewal of Licenses for Radio and Television Stations—Full-power AM and FM radio stations, as well as **LPFM and FM Translator stations**, licensed to communities in **Colorado, Minnesota, Montana, North Dakota, or South Dakota**, and **full-power television, Class A television, LPTV and TV Translator stations** licensed to communities in **Alabama or Georgia**, must file by this date their applications for renewal of license on FCC Form 303-S, along with their Equal Opportunity Employment Reports on FCC Form 396, and commercial stations must promptly submit their FCC license renewal application filing fee.

Post-filing License Renewal Announcements for Radio and Television Stations—Full-power AM and FM radio stations, as well as **LPFM stations**, licensed to communities in **Colorado, Minnesota, Montana, North Dakota, or South Dakota**, and **full-power television stations and Class A television stations**, as well as **LPTV stations capable of local origination**, licensed to communities in **Alabama or Georgia**, must begin on this date to air their post-filing license renewal announcements in accordance with the FCC's regulations. **FM Translator and TV Translator stations**, as well as **LPTV stations not capable of local origination**, licensed to communities in these jurisdictions must arrange for the required public notice of their license renewal application filing. *See Item of Note 1 above for additional information.*

Pre-filing License Renewal Announcements for Radio and Television Stations—This is the date by which **full-power AM and FM radio stations**, as well as **LPFM stations**, licensed to communities in **Kansas, Nebraska, or Oklahoma**, and **full-power and Class A television stations**, as well as **LPTV stations capable of local origination**, licensed to communities in **Arkansas, Louisiana, or Mississippi**, would normally begin airing their pre-filing license renewal announcements. However, the FCC has waived the pre-filing announcement requirement for all license renewal applications due June 1, 2020 or later. *See Item of Note 1 above for additional information.*

Annual EEO Public File Report Due—Station Employment Units that have five or more full-time employees and are comprised of **radio and/or television stations** licensed to communities in **Alabama, Colorado, Connecticut, Georgia, Maine, Massachusetts, Minnesota, Montana, New Hampshire, North Dakota, Rhode Island, South Dakota, or Vermont** must by this date place in their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period December 1, 2019 through November 30, 2020. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

FCC Form 2100, Schedule G, Annual DTV Ancillary/Supplementary Services Report Due—Commercial television, digital Class A television, and digital LPTV stations that provided feeable ancillary or supplementary services during the 12-month period ending on September 30, 2020 must by this date file FCC Form 2100, Schedule G with the FCC. Concurrent with its filing, the station is required to pay to the FCC five percent of the gross revenue derived from such services.

December 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending October 31, 2020 by this date.

December 31

Pillsbury's 2021 Broadcasters' Calendar—By this date, broadcast stations in all states should ensure they have obtained a copy of Pillsbury's *2021 Broadcasters' Calendar*, and be prepared for another fun-filled year of regulatory deadlines.

For further information about this Advisory, please contact any of the following attorneys in the Communications Practice Group.

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