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## 2020 Broadcasters' Calendar

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### Items of Note in 2020<sup>1</sup>

- 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 dates on which pre-filing public notice announcements must air, 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.
  
- 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

<sup>1</sup> 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.

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 **March 30, 2020**.
- 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](#).

## 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—All full-power and Class A television stations moving to a new channel during the repack** 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 and continues until the station has finished its transition and has filed a final report indicating that fact. *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 18 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 newspaper 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 30

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

### 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 <http://www.eeoc.gov/employers/eeo1survey> for additional background.

## 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 newspaper public notice of their license renewal application filing.

**Pre-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 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 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 **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 place in their Public Inspection File by this date the Quarterly Issues/Programs List covering the period January 1, 2020 through March 31, 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 January 1, 2020 through March 31, 2020 and place it in their Public Inspection File.

**Quarterly Transition Progress Reports—All full-power and Class A television stations moving to a new channel during the repack** 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 and continues until the station has finished its transition and has filed a final report indicating that fact.

**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.*

**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.*

**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 newspaper public notice of their license renewal application filing.

**Pre-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 and Class A television stations**, as well as **LPTV stations capable of local origination**, licensed to communities in **North Carolina or South Carolina**, 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 **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*.

### July 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 April 1, 2020 through June 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 April 1, 2020 through June 30, 2020 and place it in their Public Inspection File.

**Quarterly Transition Progress Reports**—All **full-power and Class A television stations moving to a new channel during the repack** 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 and continues until the station has finished its transition and has filed a final report indicating that fact.

**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.

## 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 newspaper public notice of their license renewal application filing.

**Pre-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 **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 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 **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

**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 newspaper public notice of their license renewal application filing.

**Pre-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 and Class A television stations**, as well as **LPTV stations capable of local origination**, licensed to communities in **Alabama or Georgia**, 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 **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—All full-power and Class A television stations moving to a new channel during the repack** 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 and continues until the station has finished its transition and has filed a final report indicating that fact.

**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 newspaper public notice of their license renewal application filing.

**Pre-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 **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**, 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 **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 fulfilled 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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