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EEO Public File Reports Due By February 1 For Broadcasters in Arkansas, Kansas, Louisiana, Mississippi, Nebraska, New Jersey, New York, and Oklahoma - David Oxenford Conducts Webinar to Refresh Kansas Broadcasters on Their EEO Obligations

Posted on January 21, 2011 by David Oxenford

February 1 is the deadline by which broadcast stations in **Arkansas**, Kansas, Louisiana, Mississippi, Nebraska, New Jersey, New York, and Oklahoma must place into their Public Inspection files their Annual EEO Public **Inspection File Report**. The report must also be available on these stations' websites, if they have such sites. The Annual EEO Public Inspection File Report provides information about the full-time jobs filled at the station in the previous year; the sources used by the station to recruit potential employees to fill the open positions; and the additional "supplemental efforts" conducted by the station, whether or not they had any employment openings, to educate and inform their communities about broadcast employment. This obligation extends to all "station **employment units**" (groups of commonly controlled stations, serving a common geographical area, with at least one common employee) with 5 or more full-time employees (a full-time employee, for FCC purposes, being one working 30 or more hours per week). Our firm's Advisory detailing the requirements for this report can be found here, with a model for the report at Appendix A of that advisory. More information about Broadcasters' EEO obligations generally can be found in our Primer on the FCC's EEO Rules, here.

Yesterday, I conducted a webinar for the **Kansas Association of Broadcasters** to provide a refresher on broadcasters' EEO obligations under FCC rules, regulations and policies. The slides used in that presentation can be viewed here. With the next cycle of **license renewal applications** beginning later this year, stations need to be especially vigilant about EEO obligations to avoid scrutiny at renewal time, which could delay the processing of renewal applications (and potentially of any sale that might be underway at that time, see our post here) and possibly lead to fines or other penalties. Radio stations in **Arkansas**, **Louisiana and Mississippi**

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will file renewals on February 1, 2012; radio stations in Kansas, Oklahoma and Nebraska will file their renewals on February 1, 2013; and those in New York and New Jersey will file by February 1, 2014. TV stations will file one year later than radio stations located in their states. As two years worth of public inspection file reports must be submitted with the license renewal applications, the hiring process used this year will be scrutinized by the FCC during the renewal process for stations in most of these states. So make sure that you are following the rules, and documenting your EEO efforts for the FCC to avoid renewal-time problems.

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