

## Important Dates for Broadcasters in 2012

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With the television license renewal cycle beginning in 2012, the radio renewal cycle continuing, Lowest Unit Rate windows for the upcoming Presidential and Congressional primaries and elections, and all of the normal regulatory issues that face broadcasters each year, there are a host of regulatory deadlines that broadcasters must note for the coming year. The attached calendar tries to summarize many of the important dates that should be on the radar of all broadcasters.

While the FCC and the rest of the Washington bureaucracy considers other big issues that may affect broadcasters—including the possibility of incentive auctions and the proposed reclamation of parts of the television spectrum, a review of the media ownership rules, online public files and new forms to document public interest obligations of broadcasters, copyright reforms, indecency enforcement, and many other issues—broadcasters, as always, will be faced with a number of mandatory deadlines throughout the year that are critical for FCC compliance, the avoidance of fines, and keeping your FCC license secure. These routine deadlines include children's programming reports, EEO public file reports, ownership reports for noncommercial stations, quarterly issues/programs lists, and annual FCC regulatory fees, all of which are required over the course of the year.

This advisory provides broadcasters with a useful preview of, and some guidance for, many of the important FCC compliance-related dates, and other deadlines broadly applicable to significant portions of the broadcast industry. The calendar shown below is not intended to be exhaustive. Some of these dates, particularly those dealing with the Lowest Unit Rate windows for political primaries and caucuses, may change (and should be confirmed locally) and additional filing deadlines may arise. This calendar is merely intended to be a road map for some of the more critical deadlines that are already known.

A few specific issues are worth mentioning. First, of particular importance this year is the commencement of the license renewal cycle for television stations, starting with TV stations in Maryland, Virginia, Washington, DC, and West Virginia on June 1st, and the continuation of the renewal cycle for radio stations. Apart from the license renewal application itself, the FCC's rules contain a number of related requirements, including the airing of pre- and post-filing announcements on stations with upcoming renewals, and the filing of an EEO Program Report in conjunction with the license renewal application in order to demonstrate compliance with the Commission's EEO rules. The calendar shows the applicable state-specific deadlines.

With the 2012 elections, broadcasters will face various Lowest Unit Rate (LUR) periods around the country—45 days before each primary and 60 days before the general election. We have tried to note the dates for the commencement of the LUR period for federal elections on this schedule. However, many of the primary dates are subject to change, and there may be other windows not noted on this calendar for LUR periods preceding state and local elections. Remember, political windows set the time during which stations must apply Lowest Unit Rates to political candidates (federal, state and local) who are running in a primary or general election, and who buy time on a station. Note that, in some states, federal primaries for Congressional positions are held at different times than the Presidential primary or caucus in that state. If the

Presidential nominating contest in a state is at a different time than the Congressional primary, candidates for Congressional office do not get Lowest Unit Rates during the Presidential primary LUR window—getting those rates instead during the 45 days before their primaries. Note that there will be non-federal political races as well. Non-federal candidates get Lowest Unit Rates during the 45 days before their particular primary and 60 days before their general election, if stations decide to sell them ad time (reasonable access does not apply to State and local races—only to federal elections). Other political rules, including reasonable access and equal opportunities, apply even outside of the 45- and 60-day windows, as soon as you have legally qualified candidates. See our [Political Broadcasting Guide](#) for more information about political broadcasting topics.

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

Further information about all of these deadlines, and about other regulatory issues that arise during the course of the year, will be provided on our blog—<http://www.broadcastlawblog.com/>. Check our blog regularly, and talk to any of the attorneys in our Broadcast Group, for more information about the many deadlines and other issues that will be important to broadcasters in 2012.

With that background, here are some of the important dates for 2012:

## January 2012

### *FCC Deadlines:*

**January 1—Third License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Alabama and Georgia.** On Jan. 1, **radio stations in Alabama and Georgia** must continue their license renewal post-filing announcements to give notice to the local community that the station filed its FCC Form 303-S license renewal application with the FCC on December 1. Similar to the pre-filing announcement aired by the stations, the post-filing announcements must air on the 1st and 16th of the three calendar months following the filing of the license renewal application.

**January 1—Third License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Arkansas, Louisiana, and Mississippi.** On Jan. 1, **radio stations in Arkansas, Louisiana, and Mississippi** must continue their license renewal pre-filing announcements. Consistent with the Commission's rules, beginning on the first day of the sixth calendar month prior to the expiration of their license, stations must air announcements on the 1st and 16th of each calendar month preceding the filing of their license renewal application to inform the community that the station seeking renewal of its license. The announcements provide information about the station's renewal filing and inform listeners that they can advise the FCC of facts relating to the application or the station's operation, and also visit the station's public inspection file. For radio stations in these states, the third and fourth pre-filing announcements must air on Jan. 1, and Jan 16.

**January 3—January 12. Filing Window for Participation in FM Auction No. 93 Open.** The filing window for parties interested in participating in the FM Auction No. 93, which

offers 119 construction permits for new FM radio stations in various locations around the country, opens at noon on January 3, 2012. Parties interested in potentially bidding in the auction must complete and file an FCC Form 175 (Short Form) application by 6:00 PM ET on January 12, 2012, when the window closes. The auction will begin on March 27, 2012, and in addition to submitting an FCC Form 175 during this window, potential bidders must also make the necessary upfront deposit by the February 22nd deadline detailed below.

**January 10—FCC Form 398 Children's Television Programming Reports Due.** By Jan. 10, all commercial full-power television stations and Class A LPTV stations must prepare and file an FCC Form 398 Children's Programming Report for the fourth quarter of 2011 with the FCC.

**January 10—Children's Television Commercial Limitations Certification.** In addition to broadcasting programming responsive to the educational and informational needs of children, the FCC's rules limit the amount of commercial material that can be aired during programming aimed at children. In order to demonstrate compliance with this rule, stations must prepare and place proof of compliance with the commercial limitations in the public inspection file every quarter. Thus, by Jan. 10, stations must prepare and place in their public inspection files proof of compliance with the children's television commercial limitations for the fourth quarter of 2011.

**January 10—Quarterly Issues Programs Lists.** By Jan. 10, all radio and television broadcast stations, both commercial and noncommercial, must prepare and place in their public inspection files a list of important issues facing their communities, and the programs aired in the months of October, November and December dealing with those issues.

**January 10—Class A LPTV Stations Demonstration of Continuing Compliance.** The FCC requires that Class A TV stations maintain in their public files sufficient information to demonstrate their continuing eligibility for Class A status—e.g., that they have broadcast three hours per week of local programming, broadcast 18 hours a day, and otherwise observed the rules that apply to full-power TV stations. While the FCC has not mandated that this report or certification be made quarterly, the preparation of the Quarterly Issues Programs lists would seem to provide a good opportunity to prepare such documentation. Accordingly, by this date, Class A stations are encouraged to prepare and place in their public inspection files information sufficient to support their continued eligibility for Class A status.

**January 16—Fourth License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Alabama and Georgia.** See January 1 entry above for more information about this obligation.

**January 16—Fourth License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Arkansas, Louisiana, and Mississippi.** See January 1 entry above for more information about this obligation.

*Other Deadlines:*

**January 14—Copyright Royalties for Internet Streaming.** By Jan. 14, webcasters, including radio stations simulcasting their programming on the Web, must pay the monthly royalty fee to SoundExchange for music streamed by the webcaster during the month ending

Nov. 30, 2011, and file Reports of Use providing information about the songs they streamed.

*Political Windows for Lowest Unit Rates:*

**January 14—Lowest Unit Rate Window Opens.** Jan. 14 is the first day of the Lowest Unit Rate period for the presidential primaries and caucuses to be held on February 28. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding their *presidential* primary or caucus on February 28 are: **Arizona and Michigan.**

**January 18—Lowest Unit Rate Window Opens.** Jan. 18 is the first day of the Lowest Unit Rate period for the presidential primaries and caucuses to be held on March 3. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding its *presidential* primary or caucus on March 3 is: Washington (Republican Caucus).

**January 21—Lowest Unit Rate Window Opens.** Jan. 21 is the first day of the Lowest Unit Rate period for the presidential and/or congressional primaries and caucuses to be held on March 6. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding their *presidential* primary or caucus on March 6 are: **Alaska (Republican Caucus), Colorado (Democratic Caucus), Georgia, Idaho (Republican Caucus), Massachusetts, North Dakota (Republican Caucus), Oklahoma, Tennessee, Texas, Vermont, Virginia, and Wyoming (Republican Caucus).** The state holding *both its congressional and presidential primary or caucus* on March 6 is: **Ohio.**

**January 22—Lowest Unit Rate Window Opens.** Jan. 22 is the first day of the Lowest Unit Rate period for the presidential primaries and caucuses to be held on March 7. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding its *presidential* primary or caucus on March 7 is: **Hawaii (Democratic Caucus).**

**January 25—Lowest Unit Rate Window Opens.** Jan. 25 is the first day of the Lowest Unit Rate period for the presidential primaries and caucuses to be held on March 10. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding their *presidential* primary or caucus on March 10 are: **Kansas (Republican Caucus) and Virgin Islands (Republican Caucus).**

**January 26—Lowest Unit Rate Window Opens.** Jan. 26 is the first day of the Lowest Unit Rate period for the presidential primaries and caucuses to be held on March 11. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding its *presidential* primary or caucus on March 11 is: **Maine (Democratic Caucus).**

**January 28—Lowest Unit Rate Window Opens.** Jan. 28 is the first day of the Lowest Unit Rate period for the presidential and/or congressional primaries and caucuses to be held on March 13. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding their *presidential* primary or caucus on March 13 are: **Hawaii (Republican Caucus) and Utah (Democratic Caucus).** The states holding *both their congressional and*

*presidential primary or caucus* on March 13 are: **Alabama and Mississippi.**

## February 2012

### FCC Deadlines:

**February 1—FCC Form 303-S License Renewal Applications due for Radio Stations in the Following States.** By February 1, commercial and noncommercial AM and FM radio stations, FM translator stations, and Low Power FM stations in **Arkansas, Louisiana, and Mississippi** must prepare and file with the FCC an FCC Form 303-S license renewal application seeking to renew their station license.

**February 1—License Renewal Post-filing Announcements Begin for Commercial and Noncommercial AM and FM Radio Stations in the Following States.** Starting February 1, stations in **Arkansas, Louisiana, and Mississippi** must begin airing post-filing announcements to give local notice that the station has filed its FCC Form 303-S license renewal application with the Commission. Similar to the pre-filing announcements, the post-filing announcements must air on the 1st and 16th of the three calendar months following the filing of the license renewal application. For radio stations in these states, the post-filing announcements will air on Feb. 1, Feb. 16, Mar. 1, Mar. 16, Apr. 1 and Apr. 16.

**February 1—Fifth License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Alabama and Georgia.** See January 1 entry above for more information about this obligation.

**February 1—License Renewal Pre-filing Announcements Begin for Radio Stations in the Following States.** On February 1, commercial and noncommercial AM and FM radio stations in **Indiana, Kentucky, and Tennessee** must begin airing pre-filing announcements to give local notice that the station is preparing to file an FCC Form 303-S license renewal application with the Commission. Consistent with the Commission's rules, beginning on the first day of the sixth calendar month prior to the expiration of their license, stations must air announcements on the 1st and 16th of each calendar month preceding the filing of their license renewal application to inform the community that the station seeking renewal of its license. The announcements provide information about the station's renewal filing and inform listeners that they can inform the FCC of facts relating to the application or the station's operation, and also visit the station's public inspection file. For radio stations in these states, the pre-filing announcements must air on Fe. 1, Feb. 16, Mar. 1, and Mar. 16.

**February 1—FCC Form 396 Broadcast EEO Program Report due for Radio Stations in the Following States.** In connection with their license renewal filings, by February 1, commercial and noncommercial AM and FM radio stations in Arkansas, Louisiana, and Mississippi must also prepare and file with the FCC an FCC Form 396 Broadcast EEO Program Report providing information on the stations' EEO compliance during the most recent license term.

**February 1—Annual EEO Public File Report.** By Feb. 1, radio and television station employment units in **Arkansas, Kansas, Louisiana, Mississippi, Nebraska, New Jersey, New York and Oklahoma** must place in their Public Inspection File and post on their Web site, if they have one, their FCC Annual EEO Public File Report.

**February 1—FCC Form 323-E Biennial Ownership Reports Due for Noncommercial**

**Stations Only in the Following Select States.** By Feb. 1, noncommercial television stations in Kansas, Nebraska and Oklahoma, and noncommercial radio stations in Arkansas, Louisiana, Mississippi, New Jersey, and New York must prepare and file electronically an FCC Form 323-E Biennial Ownership Report with the FCC. Please note, commercial stations now file their biennial ownership reports on a single unified date, which will next occur on November 1, 2013.

**February 16— Sixth and final License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Alabama and Georgia.** See January 1 entry above for more information about this obligation.

**February 16—Second License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Arkansas, Louisiana, and Mississippi.** See February 1 entry above for more information about this obligation.

**February 16—Second License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Indiana, Kentucky, and Tennessee.** See February 1 entry above for more information about this obligation.

**February 22—Upfront Payment Deadline for FM Auction No. 93.** By 6:00 p.m. ET on February 22, parties that submitted an FCC Form 175 short form application for participation in FM Auction No. 93 must submit an upfront payment to the FCC in order to eligible to bid in the March 27th auction.

*Other Deadlines:*

**February 14—Copyright Royalties for Internet Streaming.** By Feb. 14, webcasters, including radio stations simulcasting their programming on the Web, must pay the monthly royalty fee to SoundExchange for music streamed by the webcaster during the month ending Dec. 31, 2011, and file Reports of Use providing information about the songs they streamed.

*Political Windows for Lowest Unit Rates:*

**February 1— Lowest Unit Rate Window Opens.** Feb. 1 is the first day of the Lowest Unit Rate period for the presidential primaries and caucuses to be held on March 17. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding its *presidential* primary or caucus on March 17 is: **Missouri (Republican Caucus).**

**February 2—Lowest Unit Rate Window Opens.** February 2 is the first day of the Lowest Unit Rate period for the congressional primaries and caucuses to be held on March 18. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the territory holding its *congressional* primary or caucus on March 18 is: **Puerto Rico.**

**February 4—Lowest Unit Rate Window Opens.** Feb. 4 is the first day of the Lowest Unit Rate period for the presidential and/or congressional primaries and caucuses to be held on March 20. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding *both its presidential and congressional primary or caucus* on March 20 is: **Illinois.**

**February 8—Lowest Unit Rate Window Opens.** Feb. 8 is the first day of the Lowest Unit Rate period for the presidential primaries and caucuses to be held on March 24. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding its *presidential* primary or caucus on March 24 is: **Louisiana**.

**February 18—Lowest Unit Rate Window Opens.** Feb. 18 is the first day of the Lowest Unit Rate period for the presidential and/or congressional primaries and caucuses to be held on April 3. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding its *presidential* primary or caucus on April 3 is: **Wisconsin**. The states holding *both their congressional and presidential primary or caucus* on April 3 are: **District of Columbia and Maryland**.

**February 29—Lowest Unit Rate Window Opens.** Feb. 29 is the first day of the Lowest Unit Rate period for the presidential primaries and caucuses to be held on April 14. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding their *presidential* primary or caucus on April 14 are: **Idaho (Democratic Caucus), Kansas (Democratic Caucus), Nebraska (Democratic Caucus), and Wyoming (Democratic Caucus)**.

## March 2012

### *FCC Deadlines:*

**March 1—Third License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Arkansas, Louisiana, and Mississippi.** See February 1 entry above for more information about this obligation.

**March 1—Third License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Indiana, Kentucky, and Tennessee.** See February 1 entry above for more information about this obligation.

**March 16—Fourth License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Arkansas, Louisiana, and Mississippi.** See February 1 entry above for more information about this obligation.

**March 16—Fourth License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Indiana, Kentucky, and Tennessee.** See February 1 entry above for more information about this obligation.

**March 23—Mock Auction for FM Auction No. 93.** On March 23rd the FCC will hold a mock auction to allow qualified bidders to test the auction software for the upcoming FM Auction No. 93.

**March 27—FM Auction No. 93 Begins.** FM Auction No. 93 offering 119 FM construction permits for sale in various locations around the country begins.

### *Other Deadlines:*

**March 16—Copyright Royalties for Internet Streaming.** By March 16, webcasters, including radio stations simulcasting their programming on the Web, must pay the monthly

royalty fee to SoundExchange for music streamed by the webcaster during the month ending Jan. 31, 2012, and file Reports of Use providing information about the songs they streamed.

*Political Windows for Lowest Unit Rates:*

**March 1—Lowest Unit Rate Window Opens.** March 1 is the first day of the Lowest Unit Rate period for the presidential congressional primaries and caucuses to be held on April 15. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding their *presidential* primary or caucus on April 15 are: **Alaska (Democratic Caucus) and Washington (Democratic Caucus).**

**March 10—Lowest Unit Rate Window Opens.** Mar 10 is the first day of the Lowest Unit Rate period for the presidential and/or congressional primaries and caucuses to be held on April 24. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding their presidential primary or caucus on April 24 are: Connecticut, Delaware, New York, and Rhode Island Primary. The state holding *both its congressional and presidential primary or caucus* on April 24 is: **Pennsylvania.**

**March 21—Lowest Unit Rate Window Opens.** Mar 21 is the first day of the Lowest Unit Rate period for the presidential and/or congressional primaries and caucuses to be held on May 5. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding their primary or caucus on May 5 are: **Florida (Democratic Caucus) and Michigan (Democratic Caucus).**

**March 24—Lowest Unit Rate Window Opens.** Mar 24 is the first day of the Lowest Unit Rate period for the presidential and/or congressional primaries and caucuses to be held on May 8. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding *both their congressional and presidential primary or caucus* on May 8 are: **Indiana, North Carolina and West Virginia.**

**March 31—Lowest Unit Rate Window Opens.** Mar 31 is the first day of the Lowest Unit Rate period for the presidential and/or congressional primaries and caucuses to be held on May 15. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding *both their congressional and presidential primary or caucus* on May 15 are: **Nebraska, and Oregon.** In addition, **Idaho** is scheduled to hold its *congressional* primary on May 15, however, that date remains subject to cancellation/change by the state legislature.

**April 2012**

*FCC Deadlines:*

**April 1—License Renewal Post-filing Announcements Begin for Commercial and Noncommercial AM and FM Radio Stations in the Following States.** Starting April 1, radio stations in **Indiana, Kentucky and Tennessee** must begin airing post-filing announcements to give local notice that the station has filed its FCC Form 303-S license renewal application with the Commission (or will be filing on April 2nd as the filing date falls on a weekend).



Similar to the pre-filing announcements, the post-filing announcements must air on the 1st and 16th of the three calendar months following the filing of the license renewal application. For radio stations in these states, the post-filing announcements will air on April 1, April 16, May 1, May 16, June 1, and June 16.

**April 1—Fifth License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Arkansas, Louisiana, and Mississippi.** See February 1 entry above for more information about this obligation

**April 1—License Renewal Pre-filing Announcements Begin for Radio Stations in the Following States.** On April 1, commercial and noncommercial AM and FM radio stations in Michigan and Ohio must begin airing pre-filing announcements to give local notice that the station is preparing to file an FCC Form 303-S license renewal application with the Commission. Consistent with the Commission's rules, beginning on the first day of the sixth calendar month prior to the expiration of their license, stations must air announcements on the 1st and 16th of each calendar month preceding the filing of their license renewal application to inform the community that the station seeking renewal of its license. The announcements provide information about the station's renewal filing and inform listeners that they can advise the FCC of facts relating to the application or the station's operation, and also visit the station's public inspection file. For radio stations in these states, the pre-filing announcements must air on April 1, April 16, May 1, and May 16.

**April 1—License Renewal Pre-filing Announcements Begin for Television Stations in the Following States.** On June 1, television Class A stations in **Maryland, Virginia, West Virginia, and Washington, DC** must begin airing pre-filing announcements to give local notice that the station is preparing to file an FCC Form 303-S license renewal application with the Commission. Consistent with the Commission's rules, beginning on the first day of the sixth calendar month prior to the expiration of their license, stations must air announcements on the 1st and 16th of each calendar month preceding the filing of their license renewal application to inform the community that the station seeking renewal of its license. The announcements provide information about the station's renewal filing and inform listeners that they can advise the FCC of facts relating to the application or the station's operation, and also visit the station's public inspection file. For television and Class A stations in these states, the pre-filing announcements must air on April 1, April 16, May 1, and May 16.

**April 1—Annual EEO Public File Report.** By April 1, radio and television station employment units in **Delaware, Indiana, Kentucky, Pennsylvania, Tennessee and Texas** and must place in their Public Inspection File and post on their Web site, if they have one, their FCC Annual EEO Public File Report.

**April 1—FCC Form 323-E Biennial Ownership Reports Due for Noncommercial Stations Only in the Following Select States.** By April 2, noncommercial television stations in Texas, and noncommercial radio stations in **Delaware, Indiana, Kentucky, Pennsylvania and Tennessee** must prepare and file electronically an FCC Form 323-E Biennial Ownership Report with the FCC. Please note, commercial stations now file their biennial ownership reports on a single unified date, which will next occur on November 1, 2013.

**April 2—FCC Form 303-S License Renewal Applications due for Radio Stations in the Following States.** By April 2, commercial and noncommercial AM and FM radio stations, FM translator stations, and Low Power FM stations in Indiana, Kentucky, and Tennessee

must prepare and file with the FCC an FCC Form 303-S license renewal application seeking to renew their station license. Please note, as April 1st falls on a Sunday, the filing deadline is extended to the next business day, Monday, April 2nd.

**April 2—FCC Form 396 Broadcast EEO Program Report due for Radio Stations in the Following States.** In connection with their license renewal filings, by April 1, commercial and noncommercial AM and FM radio stations in **Indiana, Kentucky, and Tennessee** must also prepare and file with the FCC an FCC Form 396 Broadcast EEO Program Report providing information on the stations' EEO compliance during the most recent license term. Please note, as April 1st falls on a Sunday, the filing deadline is extended to the next business day, Monday, April 2nd.

**April 10—FCC Form 398 Children's Television Programming Reports Due.** By April 10, all commercial full-power television stations and Class A LPTV stations must prepare and file an FCC Form 398 Children's Programming Report for the first quarter of 2012 with the FCC.

**April 10—Children's Television Commercial Limitations Certification.** In addition to broadcasting programming responsive to the educational and informational needs of children, the FCC's rules limit the amount of commercial material that can be aired during programming aimed at children. In order to demonstrate compliance with this rule, stations must prepare and place proof of compliance with the commercial limitations in the public inspection file every quarter. Thus, by April 10, stations must prepare and place in their public inspection files proof of compliance with the children's television commercial limitations for the first quarter of 2012.

**April 10—Quarterly Issues Programs Lists.** By April 10, all radio and television broadcast stations, both commercial and noncommercial, must prepare and place in their public inspection files a list of important issues facing their communities, and the programs aired in the months of January, February and March dealing with those issues.

**April 10—Class A LPTV Stations Demonstration of Continuing Compliance.** The FCC requires that Class A TV stations maintain in their public files sufficient information to demonstrate their continuing eligibility for Class A status—e.g., that they have broadcast three hours per week of local programming, broadcast 18 hours a day, and otherwise observed the rules that apply to full-power TV stations. While the FCC has not mandated that this report or certification be made quarterly, the preparation of the Quarterly Issues Programs lists would seem to provide a good opportunity to prepare such documentation. Accordingly, by this date, Class A stations are encouraged to prepare and place in their public inspection files information sufficient to support their continued eligibility for Class A status.

**April 16—Second License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Indiana, Kentucky and Tennessee.** See April 1 entry above for more information about this obligation.

**April 16—Sixth and Final License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Arkansas, Louisiana, and Mississippi.** See February 1 entry above for more information about this obligation.

**April 16—Second License Renewal Pre-filing Announcements for Commercial and**

**Noncommercial AM and FM Radio Stations in Michigan and Ohio.** See April 1 entry above for more information about this obligation.

**April 16—Second License Renewal Pre-filing Announcements for Commercial and Noncommercial Television Stations in Maryland, Virginia, Washington, DC, and West Virginia.** See April 1 entry above for more information about this obligation.

*Other Deadlines:*

**April 14—Copyright Royalties for Internet Streaming.** By April 14, webcasters, including radio stations simulcasting their programming on the Web, must pay the monthly royalty fee to SoundExchange for music streamed by the webcaster during the month ending Feb. 29, 2012, and file Reports of Use providing information about the songs they streamed.

*Political Windows for Lowest Unit Rates:*

**April 7—Lowest Unit Rate Window Opens.** Apr. 7 is the first day of the Lowest Unit Rate period for the presidential and/or congressional primaries and caucuses to be held on May 22. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding *both their presidential and congressional primary or caucus* on May 22 are: **Arkansas and Kentucky.**

**April 21—Lowest Unit Rate Window Opens.** Apr. 21 is the first day of the Lowest Unit Rate period for the presidential and/or congressional primaries and caucuses to be held on June 5. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, states holding *both their presidential and congressional primary or caucus* on June 5 are: **California, Montana, New Jersey, New Mexico, and South Dakota.** In addition, the Democratic Party in **North Dakota** will hold its *presidential* caucus on June 5, and **Iowa** will hold its *congressional* primary on June 5.

**April 28—Lowest Unit Rate Window Opens.** Apr. 28 is the first day of the Lowest Unit Rate period for the congressional primaries and caucuses to be held on June 12. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding their *congressional* primary or caucus on June 12 are: **Maine, Nevada, North Dakota, South Carolina, and Virginia.**

## May 2012

*FCC Deadlines:*

**May 1—Third License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Indiana, Kentucky and Tennessee.** See April 1 entry above for more information about this obligation.

**May 1—Third License Renewal Pre-filing Announcements for Commercial and Noncommercial Radio Stations in Michigan and Ohio.** See April 1 entry above for more information about this obligation.

**May 1—Third License Renewal Pre-filing Announcements for Commercial and Noncommercial TV Stations in Maryland, Virginia, West Virginia, and Washington, DC.**

See April 1 entry above for more information about this obligation.

• **May 16—Fourth License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Indiana, Kentucky and Tennessee.** See April 1 entry above for more information about this obligation.

• **May 16—Fourth License Renewal Pre-filing Announcements for Commercial and Noncommercial Radio Stations in Michigan and Ohio.** See April 1 entry above for more information about this obligation.

• **May 16—Fourth License Renewal Pre-filing Announcements for Commercial and Noncommercial TV Stations in Maryland, Virginia, West Virginia, and Washington, DC.** See April 1 entry above for more information about this obligation.

*Other Deadlines:*

• **May 15—Copyright Royalties for Internet Streaming.** By May 15, webcasters, including radio stations simulcasting their programming on the Web, must pay the monthly royalty fee to SoundExchange for music streamed by the webcaster during the month ending March 31, 2012, and file Reports of Use providing information about the songs they streamed.

*Political Windows for Lowest Unit Rates:*

• **May 12—Lowest Unit Rate Window Opens.** May 12 is the first day of the Lowest Unit Rate period for the presidential and/or congressional primaries and caucuses to be held on June 26. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding *both its presidential and congressional primary or caucus* on June 26 is: **Utah**. The states holding their *congressional* primary or caucus on June 26 are: **Colorado and Oklahoma**.

**June 2012**

*FCC Deadlines:*

• **June 1—FCC Form 303-S License Renewal Applications due for Television, Class A, LPTV, and TV Translator Stations in the Following States.** By June 1, television, Class A, LPTV, and TV translator stations in **Maryland, Virginia, Washington, DC, and West Virginia** must prepare and file with the FCC an FCC Form 303-S license renewal application seeking to renew their station license.

• **June 1—FCC Form 303-S License Renewal Applications due for Radio Stations in the Following States.** By June 1, commercial and noncommercial AM and FM radio stations, FM translator stations, and Low Power FM stations in Michigan and Ohio must prepare and file with the FCC an FCC Form 303-S license renewal application seeking to renew their station license.

• **June 1—License Renewal Post-filing Announcements Begin for Television Stations in the Following States.** Starting on June 1, television and Class A television stations in Maryland, Virginia, Washington, DC, and West Virginia must begin airing post-filing announcements to give local notice that the station has filed its FCC Form 303-S license renewal application with the Commission. Similar to the pre-filing announcements, the post-

filing announcements must air on the 1st and 16th of the three calendar months following the filing of the license renewal application. For television and Class A stations in these states, the post-filing announcements will air on June 1, June 16, July 1, July 16, August 1, and August 16.

**June 1—License Renewal Post-filing Announcements Begin for Radio Stations in the Following States.** Starting on June 1, commercial and noncommercial AM and FM radio stations in Michigan and Ohio must begin airing post-filing announcements to give local notice that the station has filed its FCC Form 303-S license renewal application with the Commission. Similar to the pre-filing announcements, the post-filing announcements must air on the 1st and 16th of the three calendar months following the filing of the license renewal application. For radio stations in these states, the post-filing announcements will air on June 1, June 16, July 1, July 16, August 1, and August 16.

**June 1—Fifth License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Indiana, Kentucky and Tennessee.** See April 1 entry above for more information about this obligation.

**June 1—License Renewal Pre-filing Announcements Begin for Radio Stations in the Following States.** Starting June 1, commercial and noncommercial AM and FM radio stations in Illinois and Wisconsin must begin airing pre-filing announcements to give local notice that the station is preparing to file an FCC Form 303-S license renewal application with the Commission. Consistent with the Commission's rules, beginning on the first day of the sixth calendar month prior to the expiration of their license, stations must air announcements on the 1st and 16th of each calendar month preceding the filing of their license renewal application to inform the community that the station seeking renewal of its license. The announcements provide information about the station's renewal filing and inform listeners that they can advise the FCC of facts relating to the application or the station's operation, and also visit the station's public inspection file. For radio stations in these states, the pre-filing announcements must air on June 1, June 16, July 1, and July 16.

**June 1—License Renewal Pre-filing Announcements Begin for Television Stations in the Following States.** Starting June 1, television and Class A stations in North Carolina and South Carolina must begin airing pre-filing announcements to give local notice that the station is preparing to file an FCC Form 303-S license renewal application with the Commission. Consistent with the Commission's rules, beginning on the first day of the sixth calendar month prior to the expiration of their license, stations must air announcements on the 1st and 16th of each calendar month preceding the filing of their license renewal application to inform the community that the station seeking renewal of its license. The announcements provide information about the station's renewal filing and inform listeners that they can advise the FCC of facts relating to the application or the station's operation, and also visit the station's public inspection file. For television and Class A stations in these states, the pre-filing announcements must air on June 1, June 16, July 1, and July 16.

**June 1—FCC Form 396 Broadcast EEO Program Report due for Stations in the Following States.** In connection with their license renewal filings, by June 1, commercial and noncommercial television and Class A stations in **Maryland, Virginia, Washington, DC, and West Virginia** and radio stations in Michigan and Ohio must also prepare and file with the FCC an FCC Form 396 Broadcast EEO Program Report providing information on the

stations' EEO compliance during the most recent license term.

**June 1—Annual EEO Public File Report.** By June 1 radio and television station employment units in **Arizona, District of Columbia, Idaho, Maryland, Michigan, Nevada, New Mexico, Ohio, Utah, Virginia, West Virginia and Wyoming** must place in their Public Inspection File and post on their Web site, if they have one, their FCC Annual EEO Public File Report.

**June 1—FCC Form 323-E Biennial Ownership Reports Due for Noncommercial Stations Only in the Following Select States.** By June 1, noncommercial radio stations in Michigan and Ohio, and noncommercial television stations in **Arizona, District of Columbia, Idaho, Maryland, Nevada, New Mexico, Utah, Virginia, West Virginia and Wyoming** must prepare and file electronically an FCC Form 323-E Biennial Ownership Report with the FCC. Please note, commercial stations now file their biennial ownership reports on a single unified date, which will next occur on November 1, 2013.

**June 16—Second License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Maryland, Virginia, Washington, DC, and West Virginia.** See June 1 entry above for more information about this obligation.

**June 16—Second License Renewal Post-filing Announcements for Commercial and Noncommercial Radio Stations in Michigan and Ohio.** See June 1 entry above for more information about this obligation.

**June 16—Sixth and Final License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Indiana, Kentucky and Tennessee.** See April 1 entry above for more information about this obligation.

**June 16—Second License Renewal Pre-filing Announcements for Commercial and Noncommercial Television and Class A Stations in North Carolina and South Carolina.** See June 1 entry above for more information about this obligation.

**June 16—Second License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Illinois and Wisconsin.** See June 1 entry above for more information about this obligation.

*Other Deadlines:*

**June 14—Copyright Royalties for Internet Streaming.** By June 14, webcasters, including radio stations simulcasting their programming on the Web, must pay the monthly royalty fee to SoundExchange for music streamed by the webcaster during the month ending April 30, 2012, and file Reports of Use providing information about the songs they streamed.

*Political Windows for Lowest Unit Rates:*

**June 16—Lowest Unit Rate Window Opens.** June 16 is the first day of the Lowest Unit Rate period for the congressional primaries and caucuses to be held on July 31. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding its *congressional* primary or caucus on Jul 31 is: **Georgia.**

**June 18—Lowest Unit Rate Window Opens.** June 18 is the first day of the Lowest Unit

Rate period for the congressional primaries and caucuses to be held on August 2. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding its *congressional* primary or caucus on August 2 is: **Tennessee.**

**June 23—Lowest Unit Rate Window Opens.** June 23 is the first day of the Lowest Unit Rate period for the congressional primaries and caucuses to be held on August 7. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding their *congressional* primary or caucus on August 7 are: **Kansas, Michigan, Missouri, and Washington.**

**June 27—Lowest Unit Rate Window Opens.** June 27 is the first day of the Lowest Unit Rate period for the congressional primaries and caucuses to be held on August 11. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding its *congressional* primary or caucus on August 11 is: **Hawaii.**

**June 30—Lowest Unit Rate Window Opens.** June 30 is the first day of the Lowest Unit Rate period for the congressional primaries and caucuses to be held on August 14. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding their *congressional* primary or caucus on August 14 are: **Connecticut, Florida, Minnesota, and Wisconsin.**

## July 2012

### *FCC Deadlines:*

**July 1—Third License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Maryland, Virginia, Washington, DC, and West Virginia.** See June 1 entry above for more information about this obligation.

**July 1—Third License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Michigan and Ohio.** See June 1 entry above for more information about this obligation.

**July 1—Third License Renewal Pre-filing Announcements for Commercial and Noncommercial Television and Class A Stations in North Carolina and South Carolina.** See June 1 entry above for more information about this obligation.

**July 1—Third License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Illinois and Wisconsin.** See June 1 entry above for more information about this obligation.

**July 10—FCC Form 398 Children's Television Programming Reports Due.** By July 10, all commercial full-power television stations and Class A stations must prepare and file an FCC Form 398 Children's Programming Report for the second quarter of 2012 with the FCC.

**July 10—Children's Television Commercial Limitations Certification.** In addition to broadcasting programming responsive to the educational and informational needs of children, the FCC's rules limit the amount of commercial material that can be aired during programming aimed at children. In order to demonstrate compliance with this rule, stations

must prepare and place proof of compliance with the commercial limitations in the public inspection file every quarter. Thus, by July 10, stations must prepare and place in their public inspection files proof of compliance with the children's television commercial limitations for the second quarter of 2012.

**July 10—Quarterly Issues Programs Lists.** By July 10, all radio and television broadcast stations, both commercial and noncommercial, must prepare and place in their public inspection files a list of important issues facing their communities, and the programs aired in the months of April, May, and June dealing with those issues.

**July 10—Class A LPTV Stations Demonstration of Continuing Compliance.** The FCC requires that Class A TV stations maintain in their public files sufficient information to demonstrate their continuing eligibility for Class A status—e.g., that they have broadcast three hours per week of local programming, broadcast 18 hours a day, and otherwise observed the rules that apply to full-power TV stations. While the FCC has not mandated that this report or certification be made quarterly, the preparation of the Quarterly Issues Programs lists would seem to provide a good opportunity to prepare such documentation. Accordingly, by this date, Class A stations are encouraged to prepare and place in their public inspection files information sufficient to support their continued eligibility for Class A status.

**July 16—Fourth License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Maryland, Virginia, Washington, DC, and West Virginia.** See June 1 entry above for more information about this obligation.

**July 16—Fourth License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Michigan and Ohio.** See June 1 entry above for more information about this obligation.

**July 16—Fourth License Renewal Pre-filing Announcements for Commercial and Noncommercial Television and Class A Stations in North Carolina and South Carolina.** See June 1 entry above for more information about this obligation.

**July 16—Fourth License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Illinois and Wisconsin.** See June 1 entry above for more information about this obligation.

*Other Deadlines:*

**July 15—Copyright Royalties for Internet Streaming.** By July 15, webcasters, including radio stations simulcasting their programming on the Web, must pay the monthly royalty fee to SoundExchange for music streamed by the webcaster during the month ending May 31, 2012, and file Reports of Use providing information about the songs they streamed.

**July 31—Copyright Royalty Claims Due for Eligible Television Stations.** Parties interested in seeking compensation from the cable and satellite royalty funds for the year 2011 must file the appropriate form with the Copyright Royalty Board by July 31, 2012. Under the Copyright Act, cable systems and satellite operators that retransmit over-the-air broadcast television signals to the public must pay a compulsory fee to the Copyright Royalty Board each year. In turn, the copyright holders whose works were contained in those broadcasts may seek compensation for the retransmission of the work.



Accordingly, television stations with programming that they have produced and for which they hold the copyright, and whose signals were either carried as a distant signal on a cable system in 2011, or were rebroadcast by a direct-to-home satellite television carrier is eligible to file a claim for compensation with the Copyright Royalty Board. The royalties paid as a result of such a claim compensates the television station for the rebroadcast of their copyrighted material as a distant signal on the cable system or by the satellite operator.

Claims may be filed during the month of July either online at the Copyright Royalty Board Web site, <http://www.loc.gov/crb/claims/>, or in paper with the Copyright Royalty Board, located at the Library of Congress in Washington, D.C. Online requests must be received no later than 5 p.m. E.D.T. on July 31; hand-delivered claims no later than 5 p.m. E.D.T. on July 31; claims delivered by commercial courier no later than 4 p.m. E.D.T. on July 31; and if by U.S. mail the claim must have sufficient postage and bear a July U.S. Postal Service postmark. Federal Express, United Parcel Service and similar overnight delivery services may not be used for the filing of these claims.

*Political Windows for Lowest Unit Rates:*

**July 7—Lowest Unit Rate Window Opens.** July 7 is the first day of the Lowest Unit Rate period for the congressional primaries and caucuses to be held on August 21. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding its *congressional* primary or caucus on August 21 is: **Wyoming.**

**July 14—Lowest Unit Rate Window Opens.** July 14 is the first day of the Lowest Unit Rate period for the congressional primaries and caucuses to be held on August 28. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding their *congressional* primary or caucus on August 28 are: **Alaska, Arizona, and Vermont.**

**July 18—Lowest Unit Rate Window Opens.** July 18 is the first day of the Lowest Unit Rate period for the congressional primaries and caucuses to be held on September 1. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding its *congressional* primary or caucus on September 1 is: **Guam.**

**July 23—Lowest Unit Rate Window Opens.** July 23 is the first day of the Lowest Unit Rate period for the congressional primaries and caucuses to be held on September 6. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding its *congressional* primary or caucus on September 6 is: **Massachusetts.**

**July 25—Lowest Unit Rate Window Opens.** July 25 is the first day of the Lowest Unit Rate period for the congressional primaries and caucuses to be held on September 8. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the state holding its *congressional* primary or caucus on September 8 is: **Virgin Islands.**

**July 28—Lowest Unit Rate Window Opens.** July 28 is the first day of the Lowest Unit

Rate period for the congressional primaries and caucuses to be held on September 11. According to the list of dates available on the website of the National Association of Secretaries of State and/or the Federal Election Commission, the states holding their *congressional* primary or caucus on September 11 are: **Delaware, New Hampshire, New York, and Rhode Island.**

## August 2012

### *FCC Deadlines:*

**August 1—FCC Form 303-S License Renewal Applications due for Radio Stations in the Following States.** By August 1, commercial and noncommercial AM and FM radio stations, FM translator stations, and Low Power FM stations in Illinois and Wisconsin must prepare and file with the FCC an FCC Form 303-S license renewal application seeking to renew their station license

**August 1—FCC Form 303-S License Renewal Applications due for Television, Class A, LPTV, and TV Translator Stations in the Following States.** By August 1, Television, Class A, LPTV, and TV Translator Stations in **North Carolina and South Carolina** must prepare and file with the FCC an FCC Form 303-S license renewal application seeking to renew their station license.

**August 1—License Renewal Post-filing for Announcements Begin for Radio Stations in the Following States.** On August 1, commercial and noncommercial AM and FM radio stations in **Illinois and Wisconsin** must begin airing post-filing announcements to give local notice that the station has filed its FCC Form 303-S license renewal application with the Commission. Similar to the pre-filing announcements, the post-filing announcements must air on the 1st and 16th of the three calendar months following the filing of the license renewal application. For radio stations in these states, the post-filing announcements will air on August 1, August 16, September 1, September 16, October 1, and October 16.

**August 1—License Renewal Post-filing for Announcements Begin for Television Stations in the Following States.** Starting on June 1, television and Class A television stations in **North Carolina and South Carolina** must begin airing post-filing announcements to give local notice that the station has filed its FCC Form 303-S license renewal application with the Commission. Similar to the pre-filing announcements, the post-filing announcements must air on the 1st and 16th of the three calendar months following the filing of the license renewal application. For television and Class A stations in these states, the post-filing announcements will air on August 1, August 16, Sept. 1, Sept. 16, Oct. 1 and Oct. 16.

**August 1—Fifth License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Maryland, Virginia, Washington, DC, and West Virginia.** See June 1 entry above for more information about this obligation.

**August 1—Fifth License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Michigan and Ohio.** See June 1 entry above for more information about this obligation.

**August 1—License Renewal Pre-filing Announcements Begin for Radio Stations in the Following States.** Starting August 1, commercial and noncommercial AM and FM radio stations in **Iowa and Missouri** must begin airing pre-filing announcements to give local notice

that the station is preparing to file an FCC Form 303-S license renewal application with the Commission. Consistent with the Commission's rules, beginning on the first day of the sixth calendar month prior to the expiration of their license, stations must air announcements on the 1st and 16th of each calendar month preceding the filing of their license renewal application to inform the community that the station seeking renewal of its license. The announcements provide information about the station's renewal filing and inform listeners that they can advise the FCC of facts relating to the application or the station's operation, and also visit the station's public inspection file. For radio stations in these states, the pre-filing announcements must air on Aug. 1, Aug. 16, Sept. 1, and Sept. 16.

**August 1—License Renewal Pre-filing Announcements Begin for Television Stations in the Following States.** Starting August 1, television and Class A stations in **Florida, Puerto Rico, and the Virgin Islands** must begin airing pre-filing announcements to give local notice that the station is preparing to file an FCC Form 303-S license renewal application with the Commission. Consistent with the Commission's rules, beginning on the first day of the sixth calendar month prior to the expiration of their license, stations must air announcements on the 1st and 16th of each calendar month preceding the filing of their license renewal application to inform the community that the station seeking renewal of its license. The announcements provide information about the station's renewal filing and inform listeners that they can advise the FCC of facts relating to the application or the station's operation, and also visit the station's public inspection file. For television and Class A stations in these states, the pre-filing announcements must air on Aug. 1, Aug. 16, Sept. 1, and Sept. 16.

**August 1—FCC Form 396 Broadcast EEO Program Report due for Stations in the Following States.** In connection with their license renewal filings, by June 1, commercial and noncommercial television and Class A stations in **North Carolina and South Carolina**, and radio stations in Illinois and Wisconsin must also prepare and file with the FCC an FCC Form 396 Broadcast EEO Program Report providing information on the stations' EEO compliance during the most recent license term.

**August 1—Annual EEO Public File Report.** By Aug. 1, radio and television station employment units in **California, Illinois, North Carolina, South Carolina and Wisconsin** must place in their Public Inspection File and post on their Web site, if they have one, their FCC Annual EEO Public File Report.

**August 1—FCC Form 323-E Biennial Ownership Reports Due for Noncommercial Stations Only in the Following Select States.** By Aug. 1, noncommercial radio stations in Illinois and Wisconsin, and noncommercial television stations in **California, North Carolina and South Carolina** must prepare and file electronically an FCC Form 323-E Biennial Ownership Report with the FCC. Please note, commercial stations now file their biennial ownership reports on a single unified date, which will next occur on November 1, 2013.

**August 16—Second License Renewal Post-filing Announcements for Commercial and Noncommercial TV Stations in North Carolina and South Carolina.** See August 1 entry above for more information about this obligation.

**August 16—Second License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Illinois and Wisconsin.** See August 1

entry above for more information about this obligation.

• **August 16—Sixth and Final License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Maryland, Virginia, Washington, DC, and West Virginia.** See June 1 entry above for more information about this obligation.

• **August 16—Sixth and Final License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Michigan and Ohio.** See June 1 entry above for more information about this obligation.

• **August 16—Second License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Iowa and Missouri.** See August 1 entry above for more information about this obligation.

• **August 16—Second License Renewal Pre-filing Announcements for Television and Class A Stations in Florida, Puerto Rico, and the Virgin Islands.** See August 1 entry above for more information about this obligation.

*Other Deadlines:*

• **August 14—Copyright Royalties for Internet Streaming.** By Aug. 14, webcasters, including radio stations simulcasting their programming on the Web, must pay the monthly royalty fee to SoundExchange for music streamed by the webcaster during the month ending June 30, 2012, and file Reports of Use providing information about the songs they streamed.

**September 2012**

*FCC Deadlines:*

• **September 1—Third License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in North Carolina and South Carolina.** See August 1 entry above for more information about this obligation.

• **September 1—Third License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Illinois and Wisconsin.** See August 1 entry above for more information about this obligation.

• **September 1—Third License Renewal Pre-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Florida, Puerto Rico, and the Virgin Islands.** See August 1 entry above for more information about this obligation.

• **September 1—Third License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Iowa and Missouri.** See August 1 entry above for more information about this obligation.

• **September 16—Fourth License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in North Carolina and South Carolina.** See August 1 entry above for more information about this obligation.

• **September 16—Fourth License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Illinois and Wisconsin.**

See August 1 entry above for more information about this obligation.

• **September 16—Fourth License Renewal Pre-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Florida, Puerto Rico, and the Virgin Islands.** See August 1 entry above for more information about this obligation.

• **September 16—Fourth License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Iowa and Missouri.** See August 1 entry above for more information about this obligation.

• **September—Annual FCC Regulatory Fees Due.** Although the precise date will not be determined until the Summer of 2012, the deadline for paying the FCC's Annual Regulatory Fees is typically mid-September. Broadcasters must pay their FCC Annual Regulatory Fees by the deadline established by the FCC, or else face a 25 percent penalty, and the possible delay or dismissal of any pending applications. The Annual Regulatory Fees will cover the period from Oct. 1, 2011, through Sept. 30, 2012.

*Other Deadlines:*

• **September 14—Copyright Royalties for Internet Streaming.** By Sept. 14, webcasters, including radio stations simulcasting their programming on the Web, must pay the monthly royalty fee to SoundExchange for music streamed by the webcaster during the month ending July 31, 2012, and file Reports of Use providing information about the songs they streamed.

*Political Windows for Lowest Unit Rates:*

• **September 7—Lowest Unit Rate Window Opens for November 6 General Election.** September 7 marks sixty days before the November 6 general election, which means that stations must offer qualified candidates the lowest unit rate from Sept. 7 through the election.

**October 2012**

*FCC Deadlines:*

• **October 1—FCC Form 303-S License Renewal Applications due for Television, Class A, LPTV, and TV Translator Stations in the Following States.** By October 1, Television, Class A, LPTV, and TV Translator Stations in **Florida, Puerto Rico, and Virgin Islands** must prepare and file with the FCC an FCC Form 303-S license renewal application seeking to renew their station license.

• **October 1—FCC Form 303-S License Renewal Applications due for Radio Stations in the Following States.** By October 1, commercial and noncommercial AM and FM radio stations, FM translator stations, and Low Power FM stations in Iowa and Missouri must prepare and file with the FCC an FCC Form 303-S license renewal application seeking to renew their station license.

• **October 1—License Renewal Post-filing Announcements Begin for Television Stations in the Following States.** Starting on October 1, television and Class A television stations in **Florida, Puerto Rico, and Virgin Islands** must begin airing post-filing announcements to give local notice that the station has filed its FCC Form 303-S license

renewal application with the Commission. Similar to the pre-filing announcements, the post-filing announcements must air on the 1st and 16th of the three calendar months following the filing of the license renewal application. For television and Class A stations in these states, the post-filing announcements will air on Oct. 1, Oct., 16, Nov. 1, Nov. 16, Dec. 1, and Dec. 16.

**October 1—License Renewal Post-filing Announcements Begin for Radio Stations in the Following States.** Starting on October 1, commercial and noncommercial AM and FM radio stations in **Iowa and Missouri** must begin airing post-filing announcements to give local notice that the station has filed its FCC Form 303-S license renewal application with the Commission. Similar to the pre-filing announcements, the post-filing announcements must air on the 1st and 16th of the three calendar months following the filing of the license renewal application. For radio stations in these states, the post-filing announcements will air on Oct. 1, Oct., 16, Nov. 1, Nov. 16, Dec. 1, and Dec. 16.

**October 1—Fifth License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Illinois and Wisconsin.** See August 1 entry above for more information about this obligation.

**October 1—Fifth License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in North Carolina and South Carolina.** See August 1 entry above for more information about this obligation.

**October 1—License Renewal Pre-filing Announcements Begin for Radio Stations in the Following States.** Starting October 1, commercial and noncommercial AM and FM radio stations in **Colorado, Minnesota, Montana, North Dakota, and South Dakota** must begin airing pre-filing announcements to give local notice that the station is preparing to file an FCC Form 303-S license renewal application with the Commission. Consistent with the Commission's rules, beginning on the first day of the sixth calendar month prior to the expiration of their license, stations must air announcements on the 1st and 16th of each calendar month preceding the filing of their license renewal application to inform the community that the station seeking renewal of its license. The announcements provide information about the station's renewal filing and inform listeners that they can advise the FCC of facts relating to the application or the station's operation, and also visit the station's public inspection file. For radio stations in these states, the pre-filing announcements must air on Oct. 1, Oct. 16, Nov. 1, and Nov. 16.

**October 1—License Renewal Pre-filing Announcements Begin for Television Stations in the Following States.** Starting October 1, television and Class A stations in **Alabama and Georgia** must begin airing pre-filing announcements to give local notice that the station is preparing to file an FCC Form 303-S license renewal application with the Commission. Consistent with the Commission's rules, beginning on the first day of the sixth calendar month prior to the expiration of their license, stations must air announcements on the 1st and 16th of each calendar month preceding the filing of their license renewal application to inform the community that the station seeking renewal of its license. The announcements provide information about the station's renewal filing and inform listeners that they can advise the FCC of facts relating to the application or the station's operation, and also visit the station's public inspection file. For television and Class A stations in these states, the pre-filing announcements must air on Oct. 1, Oct. 16, Nov. 1, and Nov. 16.

**October 1—FCC Form 396 Broadcast EEO Program Report due for Stations in the Following States.** In connection with their license renewal filings, by October 1, 2012, commercial and noncommercial AM and FM radio stations in Iowa and Missouri and commercial and noncommercial television and Class A stations in **Florida, Puerto Rico, and the Virgin Islands** must also prepare and file with the FCC an FCC Form 396 Broadcast EEO Program Report providing information on the stations' EEO compliance during the most recent license term.

**October 1—Annual EEO Public File Report.** By Oct. 1, radio and television station employment units in **Alaska, American Samoa, Florida, Guam, Hawaii, Iowa, Mariana Islands, Missouri, Oregon, Puerto Rico, Virgin Islands and Washington** must place in their Public Inspection File and post on their Web site, if they have one, their FCC Annual EEO Public File Report.

**October 1—FCC Form 323-E Biennial Ownership Reports Due for Noncommercial Stations Only in the Following Select States.** By Oct. 1, noncommercial radio stations in Iowa and Missouri, and noncommercial television stations in **Alaska, American Samoa, Florida, Guam, Hawaii, Mariana Islands, Oregon, Puerto Rico, Virgin Islands and Washington** must prepare and file electronically an FCC Form 323-E Biennial Ownership Report with the FCC. Please note, commercial stations now file their biennial ownership reports on a single unified date, which will next occur on November 1, 2013.

**October 10—FCC Form 398 Children's Television Programming Reports Due.** By Oct. 10, all commercial full-power television stations and Class A LPTV stations must prepare and file an FCC Form 398 Children's Programming Report for the third quarter of 2012 with the FCC.

**October 10—Children's Television Commercial Limitations Certification.** In addition to broadcasting programming responsive to the educational and informational needs of children, the FCC's rules limit the amount of commercial material that can be aired during programming aimed at children. In order to demonstrate compliance with this rule, stations must prepare and place proof of compliance with the commercial limitations in the public inspection file every quarter. Thus, by Oct. 10, stations must prepare and place in their public inspection files proof of compliance with the children's television commercial limitations for the third quarter of 2012.

**October 10—Quarterly Issues Programs Lists.** By Oct. 10, all radio and television broadcast stations, both commercial and noncommercial, must prepare and place in their public inspection files a list of important issues facing their communities, and the programs aired in the months of July, August and September dealing with those issues.

**October 10—Class A LPTV Stations Demonstration of Continuing Compliance.** The FCC requires that Class A TV stations maintain in their public files sufficient information to demonstrate their continuing eligibility for Class A status—e.g., that they have broadcast three hours per week of local programming, broadcast 18 hours a day, and otherwise observed the rules that apply to full-power TV stations. While the FCC has not mandated that this report or certification be made quarterly, the preparation of the Quarterly Issues Programs lists would seem to provide a good opportunity to prepare such documentation. Accordingly, by this date, Class A stations are encouraged to prepare and place in their public inspection files information sufficient to support their continued eligibility for Class A

status.

**October 16—Second License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Florida, Puerto Rico, and the Virgin Islands.** See Oct. 1 entry above for more information about this obligation.

**October 16—Second License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Iowa and Missouri.** See October 1 entry above for more information about this obligation.

**October 16—Sixth and Final License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Illinois and Wisconsin.** See Aug. 1 entry above for more information about this obligation.

**October 16—Sixth and Final License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in North Carolina and South Carolina.** See Aug. 1 entry above for more information about this obligation.

**October 16—Second License Renewal Pre-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Alabama and Georgia.** See October 1 entry above for more information about this obligation.

**October 16—Second License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Colorado, Minnesota, Montana, North Dakota, and South Dakota.** See October 1 entry above for more information about this obligation.

*Other Deadlines:*

**October 15—Copyright Royalties for Internet Streaming.** By Oct. 15, webcasters, including radio stations simulcasting their programming on the Web, must pay the monthly royalty fee to SoundExchange for music streamed by the webcaster during the month ending Aug. 31, 2012, and file Reports of Use providing information about the songs they streamed.

**November 2012**

*FCC Deadlines:*

**November 1—Third License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Florida, Puerto Rico, and the Virgin Islands.** See Oct. 1 entry above for more information about this obligation.

**November 1—Third License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Iowa and Missouri.** See October 1 entry above for more information about this obligation.

**November 1—Third License Renewal Pre-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Alabama and Georgia.** See October 1 entry above for more information about this obligation.

**November 1—Third License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Colorado, Minnesota, Montana,**



**North Dakota, and South Dakota.** See October 1 entry above for more information about this obligation.

• **November 16—Fourth License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Florida, Puerto Rico, and the Virgin Islands.** See Oct. 1 entry above for more information about this obligation.

• **November 16—Fourth License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Iowa and Missouri.** See October 1 entry above for more information about this obligation.

• **November 16—Fourth License Renewal Pre-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Alabama and Georgia.** See October 1 entry above for more information about this obligation.

• **November 16—Fourth License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Colorado, Minnesota, Montana, North Dakota, and South Dakota.** See October 1 entry above for more information about this obligation.

*Other Deadlines:*

• **November 14—Copyright Royalties for Internet Streaming.** By Nov. 14, webcasters, including radio stations simulcasting their programming on the Web, must pay the monthly royalty fee to SoundExchange for music streamed by the webcaster during the month ending Sept. 30, 2012, and file Reports of Use providing information about the songs they streamed.

*Political Window for Lowest Unit Rates:*

• **November 6—General Election.**

**December 2012**

*FCC Deadlines:*

• **December 1—License Renewal Post-filing Announcements Begin for Television Stations in the Following States.** Starting on December 1, television and Class A television stations in **Alabama and Georgia** must begin airing post-filing announcements to give local notice that the station has filed its FCC Form 303-S license renewal application with the Commission (or will be filing on December 3rd). Similar to the pre-filing announcements, the post-filing announcements must air on the 1st and 16th of the three calendar months following the filing of the license renewal application. For television and Class A stations in these states, the post-filing announcements will air on Dec. 1, Dec. 16, Jan. 1, Jan. 16, Feb. 1, and Feb. 16.

• **December 1—License Renewal Post-filing Announcements Begin for Radio Stations in the Following States.** Starting on December 1, commercial and noncommercial AM and FM radio stations in Colorado, Minnesota, Montana, North Dakota, and South Dakota must begin airing post-filing announcements to give local notice that the station has filed its FCC Form 303-S license renewal application with the Commission (or will be filing on December 3rd). Similar to the pre-filing announcements, the post-filing announcements must

air on the 1st and 16th of the three calendar months following the filing of the license renewal application. For radio stations in these states, the post-filing announcements will air on Dec. 1, Dec. 16, Jan. 1, Jan. 16, Feb. 1, and Feb. 16.

**December 1—Fifth License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Iowa and Missouri.** See October 1 entry above for more information about this obligation.

**December 1—Fifth License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Florida, Puerto Rico, and the Virgin Islands.** See October 1 entry above for more information about this obligation.

**December 1—License Renewal Pre-filing Announcements Begin for Radio Stations in the Following States.** Starting December 1, commercial and noncommercial AM and FM radio stations in **Kansas, Nebraska, and Oklahoma** must begin airing pre-filing announcements to give local notice that the station is preparing to file an FCC Form 303-S license renewal application with the Commission. Consistent with the Commission's rules, beginning on the first day of the sixth calendar month prior to the expiration of their license, stations must air announcements on the 1st and 16th of each calendar month preceding the filing of their license renewal application to inform the community that the station seeking renewal of its license. The announcements provide information about the station's renewal filing and inform listeners that they can advise the FCC of facts relating to the application or the station's operation, and also visit the station's public inspection file. For radio stations in these states, the pre-filing announcements must air on Dec. 1, Dec. 16, Jan. 1, and Jan. 16.

**December 1—License Renewal Pre-filing Announcements Begin for Television Stations in the Following States.** Starting December 1, television and Class A stations in **Arkansas, Louisiana, and Mississippi** must begin airing pre-filing announcements to give local notice that the station is preparing to file an FCC Form 303-S license renewal application with the Commission. Consistent with the Commission's rules, beginning on the first day of the sixth calendar month prior to the expiration of their license, stations must air announcements on the 1st and 16th of each calendar month preceding the filing of their license renewal application to inform the community that the station seeking renewal of its license. The announcements provide information about the station's renewal filing and inform listeners that they can advise the FCC of facts relating to the application or the station's operation, and also visit the station's public inspection file. For television and Class A stations in these states, the pre-filing announcements must air on Dec. 1, Dec. 16, Jan. 1, and Jan. 16.

**December 1—Annual EEO Public File Report.** By Dec. 1, radio and television station employment units in **Alabama, Colorado, Connecticut, Georgia, Massachusetts, Maine, Minnesota, Montana, New Hampshire, North Dakota, Rhode Island, South Dakota and Vermont** must place in their Public Inspection File and post on their Web site, if they have one, their FCC Annual EEO Public File Report.

**December 3—FCC Form 303-S License Renewal Applications due for Television, Class A, LPTV, and TV Translator Stations in the Following States.** By December 3, television, Class A, LPTV, and TV Translator Stations in Alabama and Georgia must prepare and file with the FCC an FCC Form 303-S license renewal application seeking to renew their station license. Please note, as December 1st falls on a Saturday, the filing deadline is

extended to the next business day, Monday, December 3rd.

**December 3—FCC Form 303-S License Renewal Applications due for Radio Stations in the Following States.** By December 3, commercial and noncommercial AM and FM radio stations, FM translator stations, and Low Power FM stations in **Colorado, Minnesota, Montana, North Dakota, and South Dakota** must prepare and file with the FCC an FCC Form 303-S license renewal application seeking to renew their station license. Please note, as December 1st falls on a Saturday, the filing deadline is extended to the next business day, Monday, December 3rd.

**December 3—FCC Form 396 Broadcast EEO Program Report due for Stations in the Following States.** In connection with their license renewal filings, by December 3, 2012, commercial and noncommercial AM and FM radio stations in **Colorado, Minnesota, Montana, North Dakota, and South Dakota** and commercial and noncommercial television and Class A stations in **Alabama and Georgia** must also prepare and file with the FCC an FCC Form 396 Broadcast EEO Program Report providing information on the stations' EEO compliance during the most recent license term. Please note, as December 1st falls on a Saturday, the filing deadline is extended to the next business day, Monday, December 3rd.

**December 3—FCC Form 317 Due for DTV Stations.** By Dec. 3, 2012, commercial and noncommercial digital television stations, licensed digital Class A stations, and licensed digital low power TV stations must file an FCC Form 317 electronically reporting on whether the station has provided any ancillary and supplementary services during the 12-month period ending on Sept. 30, 2012. In addition, if the station did provide such services and generated any revenue from such services, then the station must also remit the required fee, equivalent to five percent of the gross revenues derived from such service, to the FCC by Dec. 3. Please note, as December 1st falls on a Saturday, the filing deadline is extended to the next business day, Monday, December 3rd.

**December 3—FCC Form 323-E Biennial Ownership Reports Due for Noncommercial Stations Only in the Following Select States.** By Dec. 1, noncommercial radio stations in **Colorado, Minnesota, Montana, North Dakota and South Dakota**, and noncommercial television stations in **Alabama, Connecticut, Georgia, Massachusetts, Maine, New Hampshire, Rhode Island and Vermont** must prepare and file electronically an FCC Form 323-E Biennial Ownership Report with the FCC. Please note, commercial stations now file their biennial ownership reports on a single unified date, which will next occur on November 1, 2013. Please note, as December 1st falls on a Saturday, the filing deadline is extended to the next business day, Monday, December 3rd.

**December 16—Second License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Alabama and Georgia.** See Dec. 1 entry above for more information about this obligation.

**December 16—Second License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Colorado, Minnesota, Montana, North Dakota, and South Dakota.** See Dec. 1 entry above for more information about this obligation.

**December 16—Sixth and Final License Renewal Post-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Iowa and Missouri.** See

Oct. 1 entry above for more information about this obligation.

**December 16—Sixth and Final License Renewal Post-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Florida, Puerto Rico, and the Virgin Islands.** See Oct. 1 entry above for more information about this obligation.

**December 16—Second License Renewal Pre-filing Announcements for Commercial and Noncommercial Television and Class A Stations in Arkansas, Louisiana, and Mississippi.** See Dec. 1 entry above for more information about this obligation.

**December 16—Second License Renewal Pre-filing Announcements for Commercial and Noncommercial AM and FM Radio Stations in Kansas, Nebraska, and Oklahoma.** See Dec. 1 entry above for more information about this obligation.

*Other Deadlines:*

**December 15—Copyright Royalties for Internet Streaming.** By Dec. 15, 2012, webcasters, including radio stations simulcasting their programming on the Web, must pay the monthly royalty fee to SoundExchange for music streamed by the webcaster during the month ending Oct. 31, 2012, and file Reports of Use providing information about the songs they streamed.

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For more information about these deadlines or issues, please contact any of the lawyers in the Davis Wright Tremaine LLP Broadcast Practice Area or visit our blog at [www.broadcastlawblog.com](http://www.broadcastlawblog.com) throughout the year.

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