

## [Ready for Those Summer Interns at Your Broadcast Station? Watch the Legal Issues](#)

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It's almost summer time, and broadcast stations and other media companies are getting ready for the arrival of the summer associates. As we've written in our [Guide to the FCC's EEO Rules](#), all FCC-licensed stations with 5 or more full-time employees must, in addition to **widely disseminating information about their job openings**, must complete a certain number of "**supplemental efforts**" from a menu list provided by the FCC - efforts intended to educate the public about broadcast employment, the training necessary for such employment and how to locate such employment. One of the menu options is an internship program - and many stations have such programs, some conducted in connection with various broadcast associations, some conducted with local educational institutions, and some just set up by the station itself. As with anything else, stations, especially commercial stations, need to consider the legal issues that internship programs raise - especially unpaid internships.

In particular, stations need to be careful that interns don't cross the line, doing more "real" work at a station and displacing paid employees, in a way that might create wage and hour liability to the station. Our **Davis Wright Tremaine Employment Practice Group** has just published a great memo, setting out the details of an analysis that all employers should go through in setting up an internship program to make sure that they don't run afoul of the wage and hour laws - in a simple and straightforward way. You can find that advisory, [Summertime Blues: Limits on Using Unpaid Student Interns and Volunteers, here.](#) Read it, and make your summer worry-free!

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