



December 2024

Communications

2025 Broadcasters' Calendar

Items of Note in 20251

I. Commercial and Noncommercial Biennial Ownership Reports: December 1, 2025 is the deadline by which all commercial and noncommercial radio and television stations must file their biennial ownership reports. Commercial stations will file FCC Form 2100, Schedule 323, and noncommercial stations will file FCC Form 2100, Schedule 323-E. The filing window opens October 1, 2025, and all ownership reports must reflect information current as of that date.

January 1

Audio Description Requirements Extend to Nielsen Designated Market Areas 101 to 110— Commercial television stations affiliated with one of the top four broadcast networks and assigned to Johnson City-Bristol-Kingsport, Reno, Greenville-New Bern-Washington, Davenport-Rock Island-Moline, Tallahassee-Thomasville, Lincoln-Hastings-Kearney, Evansville, Fort Wayne, Johnstown-Altoona-State College, and Augusta-Aiken Nielsen Designated Market Areas must comply with the FCC's audio description (formerly called video description) rules.

January 10

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must upload to their Public Inspection File by this date the Quarterly Issues/Programs List covering the period October 1, 2024 through December 31, 2024.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their Public Inspection File sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations

¹ The deadlines in the **2025 Broadcasters' Calendar** are based on information known as of the date hereof and may or may not apply to any particular broadcaster. They are provided for general informational purposes only and should be double-checked for currency close to each pertinent date/deadline. Actions by the FCC, Congress, or the courts could affect any of these deadlines by, for example, eliminating a particular reporting/filing obligation altogether or modifying the form used, content, deadline, fee, or manner of reporting/filing. It should also be noted that, as a general rule, when a deadline for filing a document with the FCC falls on a weekend or a federal holiday, the filing deadline shifts to the next business day. The listing below is not intended to be complete or exhaustive of all regulatory and non-regulatory deadlines that may apply to a given broadcaster year-to-year. Accordingly, broadcasters should seek the advice of communications counsel to assure timely and proper filing. This edition of our annual Broadcasters' Calendar supersedes all prior editions and accordingly any prior editions should no longer be used.

generate such documentation for the period October 1, 2024 through December 31, 2024 and upload it to their Public Inspection File.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period October 1, 2024 through December 31, 2024 and upload it to their Public Inspection File by this date. See 47 CFR § 73.3527(e)(14).

Sponsorship Identification Requirements for Foreign Government-Provided Programming—All licensees airing any foreign programming which requires a specific disclosure at the time of broadcast during the period October 1, 2024 through December 31, 2024 must place copies of the disclosures and the name of the program to which the disclosures were appended in their Public Inspection File by this date. See 47 CFR Section 73.1212(j).

January 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms

Due—Commercial and noncommercial webcasters and those broadcast stations streaming their

programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account
forms with SoundExchange for the month ending November 30, 2024 by this date.

January 30

Annual Children's Television Programming Report Due—Commercial full-power and Class A television stations must by this date file FCC Form 2100, Schedule H (formerly FCC Form 398) demonstrating their responsiveness to "the educational and informational needs of children" during calendar year 2024.

Annual Certification of Children's Commercial Time Limitations Due—Commercial full-power and Class A television stations must upload to their Public Inspection File by this date records "sufficient to verify compliance" with the FCC's commercial limitations in children's programming broadcast during calendar year 2024.

January 31

Copyright Royalty Fee: Annual Minimum Fee Statement of Account Form Due—By this date, most commercial and noncommercial webcasters and those broadcast stations streaming their programming over the Internet must submit the Minimum Fee Statement of Account Form and the annual copyright royalty fee to SoundExchange. January 31 is also the date by which certain noncommercial educational webcasters, such as student-run noncommercial educational stations streaming their programming over the Internet, may elect to pay a \$100 fee to obtain a waiver of certain reporting requirements for the upcoming calendar year. If your radio station programming is streamed over the Internet, we encourage you to consult qualified counsel with regard to your obligations.

February 1

Annual EEO Public Inspection File Report Due—Station Employment Units that have five or more full-time employees and are comprised of radio and/or television stations licensed to communities in Arkansas, Kansas, Louisiana, Mississippi, Nebraska, New Jersey, New York, or Oklahoma must by this date upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period February 1, 2024 through January 31, 2025. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our EEO Advisory.

February 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms

Due—Commercial and noncommercial webcasters and those broadcast stations streaming their

programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account
forms with SoundExchange for the month ending December 31, 2024 by this date.

March 17

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations streaming their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending January 31, 2025 by this date.

April 1

Annual EEO Public Inspection File Report Due—Station Employment Units that have five or more full-time employees and are comprised of radio and/or television stations licensed to communities in Delaware, Indiana, Kentucky, Pennsylvania, Tennessee, or Texas must by this date upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period April 1, 2024 through March 31, 2025. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our EEO Advisory.

April 10

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must upload to their Public Inspection File by this date the Quarterly Issues/Programs List covering the period January 1, 2025 through March 31, 2025.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their Public Inspection File sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period January 1, 2025 through March 31, 2025 and upload it to their Public Inspection File.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period January 1, 2025 through March 31, 2025 and upload it to their Public Inspection File by this date. See 47 CFR § 73.3527(e)(14).

Sponsorship Identification Requirements for Foreign Government-Provided Programming—All licensees airing any foreign programming which requires a specific disclosure at the time of broadcast during the period January 1, 2025 through March 31, 2025 must place copies of the disclosures and the name of the program to which the disclosures were appended in their Public Inspection File by this date. See 47 CFR Section 73.1212(j).

April 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations streaming their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending February 28, 2025 by this date.

April

EEO 1 Report—Broadcasters that are subject to the federal Equal Employment Opportunity Commission's (EEOC) reporting requirements must file their EEO 1 Report (Form 100) annually. While the EEOC has not yet announced the filing window for the 2024 EEO-1 Component 1 data collection at the time of publication of this Calendar, filers should expect that window to open in **April 2025**. Private employers that have 100 or more employees at a single establishment or collectively have 100 or more employees at multiple establishments, as well as certain federal contractors, are generally subject to this requirement and must complete the report based on employment data from a single pay period during October, November, or December 2024. We encourage you to consult with counsel on the filing and visit https://www.eeoc.gov/employers/eeo-reports-surveys for announcement of the filing window and additional background.

May 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms

Due—Commercial and noncommercial webcasters and those broadcast stations streaming their

programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account
forms with SoundExchange for the month ending March 31, 2025 by this date.

June 1

Annual EEO Public Inspection File Report Due—Station Employment Units that have five or more full-time employees and are comprised of radio and/or television stations licensed to communities in Arizona, the District of Columbia, Idaho, Maryland, Michigan, Nevada, New Mexico, Ohio, Utah, Virginia, West Virginia, or Wyoming must by this date upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period June 1, 2024 through May 31, 2025. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our <u>EEO Advisory</u>.

June 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations streaming their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending April 30, 2025 by this date.

July 10

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must upload to their Public Inspection File by this date the Quarterly Issues/Programs Lists covering the period April 1, 2025 through June 30, 2025.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their Public Inspection File sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period April 1, 2025 through June 30, 2025 and upload it to their Public Inspection File.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period April 1, 2025 through June 30, 2025 and upload it to their Public Inspection File by this date. See 47 CFR § 73.3527(e)(14).

Sponsorship Identification Requirements for Foreign Government-Provided Programming—All licensees airing any foreign programming which requires a specific disclosure at the time of broadcast during the period April 1, 2025 through June 30, 2025 must place copies of the disclosures and the name of the program to which the disclosures were appended in their Public Inspection File by this date. See 47 CFR Section 73.1212(j).

July 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations streaming their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending May 31, 2025 by this date.

July 31

Copyright Royalty Claims Due² —Television stations with locally-produced programming whose signals were carried as distant signals by at least one cable or satellite system in 2024 are eligible to file royalty claims for compensation with the Copyright Office in Washington, DC by this date. Under the federal Copyright Act, cable systems and satellite operators must pay "compulsory license" royalties to carry distant TV signals on their systems. The royalties are used to compensate the owners of copyrighted works broadcast on those signals. Stations that do not file claims by the deadline will not be able to collect royalties for distant carriage of their signals during 2024.

August 1

Annual EEO Public Inspection File Report Due—Station Employment Units that have five or more full-time employees and are comprised of radio and/or television stations licensed to communities in California, Illinois, North Carolina, South Carolina, or Wisconsin must by this date upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period August 1, 2024 through July 31, 2025. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our EEO Advisory.

August 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms

Due—Commercial and noncommercial webcasters and those broadcast stations streaming their

programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account
forms with SoundExchange for the month ending June 30, 2025 by this date.

September

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

September 14

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

² Though July 31 is the historical deadline for this obligation, the 2025 deadline has not been announced as of the date of publication of this Calendar.

programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending July 31, 2025 by this date.

October 1

Annual EEO Public Inspection File Report Due—Station Employment Units that have five or more full-time employees and are comprised of radio and/or television stations licensed to communities in Alaska, American Samoa, Florida, Guam, Hawaii, Iowa, the Mariana Islands, Missouri, Oregon, Puerto Rico, the Virgin Islands, or Washington must by this date upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period October 1, 2024 through September 30, 2025. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our EEO Advisory.

Commercial and Noncommercial Biennial Ownership Reports Filing Window Opens—The filing window for commercial stations to file FCC Form 2100, Schedule 323 (Ownership Report for Commercial Broadcast Stations) and for noncommercial stations to file FCC Form 2100, Schedule 323-E (Ownership Report for Noncommercial Broadcast Stations) opens on this date. All reports must reflect information current as of October 1, 2025. If a broadcast station is sold between October 1, 2025 and the filing date, a biennial ownership report must be filed by the party that owned the station as of October 1, 2025.

October 10

Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations must upload to their Public Inspection File by this date the Quarterly Issues/Programs List covering the period July 1, 2025 through September 30, 2025.

Class A Television Continuing Eligibility Certification—Class A television stations are required to maintain documentation in their Public Inspection File sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period July 1, 2025 through September 30, 2025 and upload it to their Public Inspection File.

Quarterly Fundraising Reports—All noncommercial educational TV and radio stations that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period July 1, 2025 through September 30, 2025 and upload it to their Public Inspection File by this date. See 47 CFR § 73.3527(e)(14).

Sponsorship Identification Requirements for Foreign Government-Provided Programming—All licensees airing any foreign programming which requires a specific disclosure at the time of broadcast during the period July 1, 2025 through September 30, 2025 must place copies of the disclosures and the name of the program to which the disclosures were appended in their Public Inspection File by this date. See 47 CFR Section 73.1212(j).

October 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations streaming their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending August 31, 2025 by this date.

November 14

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due—Commercial and noncommercial webcasters and those broadcast stations streaming their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending September 30, 2025 by this date.

December 1

Commercial and Noncommercial Biennial Ownership Reports Due—Commercial stations are required to file FCC Form 2100, Schedule 323 (Ownership Report for Commercial Broadcast Stations) and noncommercial stations must file FCC Form 2100, Schedule 323-E (Ownership Report for Noncommercial Broadcast Stations) by this date. All reports must reflect information current as of October 1, 2025. In cases where a broadcast station is sold between October 1, 2025 and the filing date, a biennial ownership report must be filed by the party that owned the station as of October 1, 2025.

Annual EEO Public Inspection File Report Due—Station Employment Units that have five or more full-time employees and are comprised of radio and/or television stations licensed to communities in Alabama, Colorado, Connecticut, Georgia, Maine, Massachusetts, Minnesota, Montana, New Hampshire, North Dakota, Rhode Island, South Dakota, or Vermont must by this date upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period December 1, 2024 through November 30, 2025. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our EEO Advisory.

FCC Form 2100, Schedule G, Annual DTV Ancillary/Supplementary Services Report Due—Commercial television, Class A television, and LPTV stations that provided feeable ancillary or supplementary services during the 12-month period ending on September 30, 2025 must by this date file FCC Form 2100, Schedule G with the FCC. Concurrent with its filing, the station is required to pay to the FCC five percent of the gross revenue derived from such services.

December 15

Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms

Due—Commercial and noncommercial webcasters and those broadcast stations streaming their

programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account
forms with SoundExchange for the month ending October 31, 2025 by this date.

December 31

Pillsbury's 2026 Broadcasters' Calendar—By this date, broadcast stations in all states should ensure they have obtained a copy of Pillsbury's *2026 Broadcasters' Calendar*, and be prepared for another year packed with regulatory deadlines.

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

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