

Broadcast Newsletter

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MEDIA BUREAU WAIVES BIENNIAL OWNERSHIP REPORTING UNTIL 2027

Based on comments filed in the Delete, Delete, Delete proceeding about the burden for broadcasters to file biennial ownership reports, the Media Bureau issued a [public notice](#) waiving the requirement to file those reports through June 1, 2027. The next biennial ownership report would have been due this fall.

Waiver of the fall filing requirement will save broadcasters time and money, especially given that a filing fee for the report is charged for every station even if the report is simply a certification that no ownership changes have occurred.

The new filing deadline is “June 1, 2027 or until further notice” so it remains possible that the Media Bureau could name a new filing date that is earlier. We find it notable that the new June 1, 2027 filing deadline coincides with the deadline for radio stations in Washington D.C., Maryland, Virginia and West Virginia to file their license renewal applications. Before the FCC went to biennial reporting several years ago, an ownership report was due along with renewal applications.

Non-biennial ownership reporting is not waived in the public notice. These reports are filed with applications for original construction permits, license applications for new stations, and in connection with assignment or transfer of control applications.

This waiver is the first significant industry-wide regulatory relief arising from the FCC’s deregulatory push. We are curious to see if the Media Bureau chooses to waive or suspend other broadcast station filing obligations.

FM BOOSTER AMENDED RULES AND FORM NOW EFFECTIVE

The Media Bureau has [announced](#) July 25, 2025 as the effective date for various new rules related to FM Booster station’s ability to originate limited amounts of local

programming. Those rules include certain public file obligations for political ads that may run uniquely on the booster station.

On the same effective date, a new form became available for mandated use by FM and LPFM stations. FCC Form 2100, Schedule 336 can be accessed in LMS and must be used to notify the Commission of the initiation of voluntary, limited use of FM booster stations to originate content on a permanent basis.

REMINDER: DECEMBER 8 DEADLINE FOR COMPLIANCE WITH REVISED FOREIGN SPONSORSHIP ID REQUIREMENTS

The FCC's foreign sponsorship identification rules for broadcasters have been around for a few years, requiring disclosures when foreign governments or their agents purchase air time on commercial stations. The FCC recently announced the effectiveness of a revised part of the rule allowing stations to optionally use two short "forms" when assessing whether a buyer of program time on the station is a foreign government or agent. Stations have been using their own certifications until now, with any affirmative responses requiring on-air disclosure and public file uploads.

The Media Bureau's [notice](#) makes December 8, 2025 the effective date for the part of the rule that allows the use of the two forms – one a licensee certification that details the actions taken and attempts to get the programmer to sign a certification, and the other being the programmer certification itself. When signed by the station or ad buyer, the station enjoys a safe harbor that the buyer is not a foreign agent. The forms can be found at [Appendix C and D](#) of the FCC's 2024 Order.

FCC MEDIA BUREAU SETTLES A FLURRY OF STILL PENDING TELEVISION STATION RENEWAL APPLICATIONS

In the past month or so, the FCC's Media Bureau has moved ahead with agreements settling numerous issues from the prior license renewal cycle where applications by television stations for license renewal were still pending due to rule violation investigations. Nearly 20 such agreements

have been announced, and are worth perusing on the Media Bureau's webpage at this [link](#).

The settlements have involved consent decrees with fines and compliance plans to ensure steps are being taken to avoid future rule violations. The agreements run the gamut of potential rule violations, from [\\$300,000](#) for Univision due to exceeding commercial limits in children's programming on 41 stations, to [\\$6,000](#) to an NCE TV station for uploading 13 issues/programs issues late, to [\\$10,000](#) to a Class A TV station for late public file uploads of issues/programs lists and commercial limits certifications.

While it is possible that some of these regulatory requirements may be relaxed in the upcoming license renewal cycle, compliance with all rules from the prior 8-year license term will still have to be certified in renewal applications. Stations should regularly cross-check all compliance matters and use two-person control to be sure that documents are prepared and timely uploaded to the station public file.

DATES TO REMEMBER

August 1, 2025

Radio and TV Stations located in North Carolina, South Carolina, Illinois, Wisconsin and California: if five (5) full time employee threshold is met, prepare EEO public file report covering the period from August 1, 2024 – July 31, 2025, upload it to the station online public inspection file and post it on the station website

Mid-Term EEO Review for Radio stations located in California: if station employment unit has **eleven (11) or more full-time employees**, an independent **mid-term EEO review** of your last two EEO public file reports by the FCC will occur in connection with the 2024-25 EEO public file report due August 1, and when uploading the report, each station in the SEU must indicate that the SEU has 11 or more full-timers using the "Mid-Term Review" tab in the OPIF settings section. If the SEU has **between five and ten full-time employees**, when uploading the 2024-25 report, each station in the SEU should indicate that the SEU has fewer than 11 full-time employees using the "Mid-Term Review" tab in the OPIF settings section (by doing so, no mid-term review of the SEU will take place)

Mid-Term EEO Review for Television stations located in Illinois and Wisconsin: if station employment unit has **five (5) or more full-time employees**, an independent **mid-term EEO review** of your last two EEO public file reports by the FCC will occur in connection with your upload of the 2024-25 EEO public file report due August 1. By uploading an EEO public file report, the FCC automatically knows that your television station meets the 5 or more full-time employee threshold for a mid-term review. Therefore unlike for radio, there is no OPIF mechanism available or needed for TV stations to specify the number of SEU employees.

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Actual resolution of legal issues depends upon many factors, including variations of facts and applicable Federal laws. This publication is not intended to provide legal advice on specific subjects, rather, it seeks to provide insight into legal developments and issues that we feel could be useful to our clients and friends.

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