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FCC STILL SHUTTERED DURING GOVERNMENT SHUTDOWN

As of this writing, with no end in sight, the FCC's main functions are shut down along with the government. Virtually every broadcaster (unless exempt) will have actions to take as soon as the government reopens and the FCC databases become available.

The FCC extended all deadlines during the shutdown to the first business day after normal operations resume. Stations will need to access OPIF and upload their 3rd quarter issues/programs list to their station public file on that first business day, and those stations that were included in but had not yet responded to the random EEO audit will need to upload their EEO audit response.

Several deadlines for Class A and LPTV major and minor modification applications, were set and have elapsed during the shutdown. Given that these applications are database-sensitive and rely on up-to-date engineering from the FCC's databases, we believe the FCC will re-set all of those deadlines rather than require the filing of such applications on the first business day after normal operations resume.

The stability of the FCC's LMS and OPIF systems will certainly be tested by a likely flood of filing attempts on the first business day back. Issues there could prompt a further extension of filing deadlines. Stations should make every effort possible to complete uploads or make filings and document any difficulties.

FCC ADOPTS NEXT GEN TV FURTHER NOTICE OF PROPOSED RULEMAKING

At its monthly meeting, the FCC Commissioners unanimously voted to move forward with the fifth proposed [rulemaking](#) related to use of the ATSC 3.0 "Next Gen" transmission standard for broadcast television, recognizing that several years have passed since it adopted rules allowing stations to voluntarily transition to ATSC 3.0 so long as a 1.0 signal was also maintained.

The NPRM responses to NAB's petition filed earlier this year urging the FCC to remove all guardrails and allow stations to transition at their own pace. The NPRM seeks volumes of information about technical issues, elimination of ATSC 1.0 simulcast requirements, application processing, coverage requirements, mandatory carriage implications, signal strength measurement levels and techniques, and the wisdom of allowing widespread elimination of ATSC 1.0 signals before consumer devices are capable of receiving 3.0 signals.

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.

DATES TO REMEMBER

First Business Day After Normal FCC Operations Resume

Per the FCC's Oct 1 public notice, all deadlines during the government shutdown are extended until the first business day after normal operations

resume. This includes the 3rd quarter issues/programs lists that were due October 10 and the EEO audit responses that were due October 17, among others.

December 1, 2025

Deadline for Full Power TV, Class A, and LPTV Stations to file FCC Form 2100, Schedule G, and pay 5% of gross revenues from any ancillary or supplementary services provided between October 1, 2024 and September 30, 2025. NCE TV stations pay on 2.5% of gross revenue. Ancillary and supplemental services do not include free over the air video content, but do include computer software distribution, data transmissions, teletext, interactive materials, aural messages, paging services, or audio signals, and subscription video. Stations that provided no such services do not have to file a report.

January 10, 2026

TV, Class A, AM & FM Stations (commercial & noncommercial): deadline to complete and upload to online public file the 4th Quarter 2025 issues/program lists and any foreign sponsorship identification reports

Class A TV Stations Only: deadline to complete and post to your online public file the 4th Quarter 2025 certification of ongoing Class A eligibility

Noncommercial Broadcast Stations: deadline to complete and post to your online public file the 4th Quarter 2025 report for any 3rd Party Fundraising conducted during the quarter

January 30, 2026

All Commercial Full Power and Class A Television Stations – deadline to complete and submit the 2024 children's television report in LMS **and** separately upload children's television commercial limits certifications for all of 2025 in the station online public file

January 31, 2026

Web Streaming Stations: deadline to remit annual license fee and related statement of account with SoundExchange for the statutory license allowing streaming of sound recordings on the web. Payment can be made on SoundExchange's online filing portal "Licensee Direct"

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