



Broadcast Newsletter

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FOREIGN ADVERSARY REPORTING RULES ADOPTED FOR ALL FCC LICENSEES

The FCC has adopted a [Report & Order](#) requiring all FCC licensees to periodically file certifications stating whether they are owned or controlled by a foreign adversary. The order defines foreign adversaries as the Peoples’ Republic of China, Cuba, Iran, North Korea, Russia, and Venezuela but those can be updated from time-to-time. A single consolidated reporting system (i.e., an entirely different system from those broadcasters currently use) is being developed for these certifications.

The certification form itself is not yet available and will need to be approved by the Office of Management & Budget before it becomes due. Once OMB approves, the FCC will issue a public notice announcing the launch of the new system, and stations will have 60 days (120 days for smaller entities) to submit their first certification. The timing of future certifications will depend on the characteristics of filing entities, earlier certification submission disclosures, or the addition of new foreign adversaries to the defined list.

Broadcasters that answer “yes” to the certification will also have to disclose any program lease agreements with the applicable foreign adversary. State or local government and Tribal Nation broadcast licensees are exempt from the new certification filing requirements. Stations not filing the certifications or inaccurately filing the certifications will be subject to a streamlined license revocation proceeding.

FIRST-EVER NCE FM TRANSLATOR FILING WINDOW COMING IN 2026

On February 18, the FCC adopted a [public notice](#) proposing applicant qualifications and a 10-application filing limit for a first-ever NCE FM translator filing window to be scheduled later this year. Comments are due quickly, within 15 days of publication in the Federal Register and reply comments within 25 days of publication in the Federal Register.

Based on the tight comment deadlines, we anticipate that the FCC will vote on this item at its April meeting, which will give the FCC's Media Bureau a green light to issue a public notice announcing filing window dates and procedures. For your planning purposes, our educated guess is that we'll see the Media Bureau's notice sometime in May with a filing window in July or August. Applications will require certification of various matters to be decided using a points system.

ONGOING CLASS A / LPTV / TV TRANSLATOR FILING DATES

The series of filing opportunities for Class A, LPTV and TV translator stations is ongoing. A temporary application filing freeze is now in effect for major change applications, but minor change applications can still be filed until **March 12, 2026 at 6p ET**. One week later, on **March 19, 2026 at 12:01 am ET**, the major modification filing freeze will be lifted, without limit or restriction, to permit the filing of Class A, LPTV and TV translator major change applications and acceptance of applications for new LPTV and TV translator stations. Applicants will also be able to file minor change applications.

The application form for new LPTV and TV translator stations will not become available in LMS until approximately a week or so before the March 19, 2026 start date for such applications. But, in the interim, stations filing applications of any kind should secure their engineering exhibits and reasonable tower assurance so they are ready to file applications on March 19th or when desired.

All the prior filing opportunities and the new ones beginning on March 19 are using a first-come, first-served daily cutoff procedure, meaning all applications filed on the same day will have priority over applications filed on the following day or days.

FCC REGISTRATION NUMBER REALITY CHECK

A few days ago, an order that the FCC adopted a year ago sparked a bit of a "panic" about broadcast licensees having to immediately update information associated with FCC registration numbers, or FRNs as they are called. The panic was unfounded, but

we thought it might be a good idea to clarify a few things.

Several years ago, the FCC adopted a requirement that those doing business with the FCC – like broadcasters and those who own them – obtain a registration number that required submission of a name, social security or taxpayer id number, address, email and other information. The FRN had many purposes, from adding security to tracking ownership information. After broadcasters made noise about it, it became possible to obtain an FRN by only submitting the last four of your social security number (a Restricted Use FRN) and for non-profit entities, an auto-generated FRN (a Special Use FRN). The FRN used to have a distinct password but the FCC later restricted use of the FRN to only those who registered and obtained a CORES username that was then associated with the FRN. By that association, a licensee can control who can access FCC systems or make filings in their name.

So, what was this "FRN panic" all about? Well over a year ago, the FCC adopted an [order](#) about submissions into its Robocall Mitigation database, which requires phone service providers to use FRNs to make those submissions. Concerned about potential errors that were being introduced into that system, the FCC decided that updates to FRN information should be made within 10 days of any changes to that information. In doing so, it cited in a footnote to a 2017 [decision](#) where the FCC fined a broadcaster for failing to maintain required records (the base fine for which is \$1,000). With that Robocall order having become effective on February 5, broadcasters suddenly began receiving an avalanche of warnings from (well-meaning) third parties to quickly update their FRN information by February 15 or be fined \$1,000 per day. The scramble that resulted caused the FCC's CORES system (which itself requires the email of a code in order to gain access) to completely shut down from the number of login attempts.

As was later clarified, the order itself was not directed at broadcasters, and it did not demand FRN updates within 10 days of the order's effectiveness with the threat of a fine attached. So, there was that reason not to panic. Then, there was this [notice](#) a day later from the Wireline Bureau

making clear that the fines for failure to update FRN information were directed specifically at Robocall Mitigation database users.

But the order did address the accuracy of FRN information, and the importance of submitting accurate information to the FCC. So, no sudden “sweep” of FRN records is occurring, and the FCC isn’t gunning for FRN holders or broadcasters. But in time, we do recommend that broadcasters log in to CORES and check the current address, phone and email information for the company FRN and those owners or officers who also have FRNs.

DATES TO REMEMBER

March 12, 2026

Class A, LPTV, TV Translator minor change applications filing freeze begins 6p ET. Application for new LPTV and TV translator applications should be available as of this date also.

March 19, 2026

Class A, LPTV, TV Translator major change applications resume, minor change freeze is lifted, and acceptance of applications for **new LPTV and TV translator** stations begins 12:01 am ET

April 1, 2026

Radio and TV Stations located in Indiana, Kentucky, Tennessee, Texas, Delaware and Pennsylvania: if five (5) full time employee threshold is met, prepare EEO public file report covering the period from April 1, 2025 to March 31, 2026, 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 Delaware and Pennsylvania: 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 2025-26 EEO public file report due April 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 is the OPIF settings section. If the SEU has **between five and ten full-time employees**, when uploading the 2025-26

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 Texas: 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 2025-26 EEO public file report due April 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. So 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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