



Virginia Association of Broadcasters Legal Review



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Legal Memorandum

In this issue, link to information about

Deadlines: [June 1: EEO Public File Reports for Many Virginia Broadcast Stations](#)
[NOT June 1: Virginia Noncommercial Radio Biennial Ownership Reports](#)

EEO Public File Reports Due June 1, 2017, for Virginia Radio and Television Stations

Virginia broadcast stations—both radio and television—with five or more full-time employees must place their annual EEO Public File Report in their public inspection file and post it to their website (if they have one) by June 1, 2017.

As stations prepare their 2017 EEO Public File Report, they will want to keep in mind the Commission's EEO recordkeeping requirements. Each year the Commission conducts random audits of radio and television stations for EEO compliance. Stations that pay close attention to the EEO recordkeeping requirements will be in a better position to respond to an EEO audit. The FCC sent out its first round of 2017 EEO audit letters in February, and the FCC typically sends out a second round of EEO audit letters later in the year.

For specific details regarding the contents of the EEO Public File Report and EEO recordkeeping requirements, stations may wish to contact their communications counsel or use the VAB hotline.

NOT Due June 1, 2017: Virginia Noncommercial Radio
Station Biennial Ownership Reports; Biennial Ownership
Reports for All Virginia Stations Are Due December 1, 2017

Historically, FCC Biennial Ownership Reports for Virginia noncommercial radio stations were due to be filed with the FCC by June 1 of odd-numbered years (unless a station is owned as part of a group of stations located in different states and the group owner specified a different, but common, date for all stations). Thus, the last time Virginia noncommercial radio stations were scheduled to file Biennial Ownership Reports was two years ago by the June 1, 2015, deadline, and June 1, 2017, would be the next due date for Virginia noncommercial radio stations to again file Biennial Ownership reports.

This memorandum is to remind Virginia noncommercial radio stations that they are no longer subject to the June 1 filing deadline for Biennial Ownership Reports in odd-numbered years. Instead, Virginia noncommercial radio stations are required to file Biennial Ownership Reports by December 1 of odd-numbered years, including 2017.

Similarly, Virginia noncommercial television stations—who were required to file Biennial Ownership Reports by June 1, 2016—will also be required to file Biennial Ownership Reports by December 1 of odd-numbered years, including 2017.

In short, all Virginia broadcast stations (noncommercial and commercial)—and broadcast stations (noncommercial and commercial) in all other states—will be required to file Biennial Ownership Reports by December 1, 2017. Stations with questions about their FCC ownership reporting requirements may wish to contact their communications counsel or the VAB hotline for assistance.

If you have any questions concerning the information discussed in this memorandum, please contact your communications counsel or any of the undersigned.

Stephen Hartzell, Editor

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