



Virginia Association of Broadcasters Legal Review



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Legal Memorandum

In this issue, please find information about

Deadline: [June 1: EEO Public File Reports for Virginia Broadcast Stations](#)

EEO Public File Reports Due June 1, 2018, for Virginia Radio and Television Stations

Virginia broadcast stations—both radio and television—with five or more full-time employees must upload their annual EEO Public File Report in their online public inspection file and post it to their website (if they have one) by June 1, 2018. (For purposes of the FCC’s EEO rules, a “full-time” employee is one who works 30 or more hours per week.)

As a reminder, the FCC’s EEO rules require broadcast stations to engage in specific non-vacancy outreach efforts. Every two years, stations that have more than 10 full-time employees and are not located in a “smaller market” must engage in at least four of the initiatives on the FCC’s “menu” of outreach options, and stations that are located in a “smaller market” or have five to ten full-time employees must engage in at least two of the initiatives. Stations with fewer than five full-time employees and religious broadcasters who apply religious qualifications to all employees are not required to engage in any “menu option” activities. For Virginia television stations, the current two-year period in which to complete these EEO “menu options” ends June 1, 2018. (Virginia radio stations are currently in the middle of their two-year period, which will end June 1, 2019.)

As stations prepare their 2018 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 2018 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.

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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