



Virginia Association of Broadcasters Legal Review



Brooks, Pierce, McLendon, Humphrey &
Leonard, LLP
Counsel to VAB • (919) 839-0300

250 West Main Street, Suite 100
Charlottesville, VA 22902 • (434)
977-3716

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Legal Memorandum

DEADLINE EXTENDED: Deadline to Register Existing C-Band Downlink Earth Station Dishes Extended to October 17

The FCC has extended the window within which broadcasters can register their existing (constructed and operational as of April 19, 2018) C-band receive-only earth stations by 90 days—until **October 17, 2018**. The Commission announced the 90-day extension in a [Public Notice](#) (“Notice”) released today in response to concerns raised by many parties over the volume of unregistered earth stations and the difficulties of preparing the information for filing.

The Notice also addresses additional concerns that have been raised about the financial burden that registration could place on parties who have large numbers of earth stations. As discussed below, the Notice provides two “batch” filing options in the hopes of reducing the cost of registration for such parties.

Background. As we have previously reported, many broadcast stations use C-band downlink earth stations to receive network and syndicated programming, but since the FCC’s rules do not require receive-only earth stations to be licensed or registered, many broadcasters who use such dishes have never registered them with the FCC. The FCC opened a filing window in which “existing” C-band receive-only earth stations could be registered that was set to close on July 18, 2018. Today’s Notice extends that deadline until **October 17, 2018**. Note, however, that the 90-day extension does not impact the April 19, 2018, cut-off date for eligible operations—i.e., only downlink dishes that were constructed and operational as of April 19, 2018, are eligible for registration during the current filing window that will close on October 17, 2018.

Two “Batch” Filing Options. The Notice explains that many parties have raised concerns about the practical and financial burden that registration would place on operators with large numbers of earth stations. Those parties urged the FCC to allow “batch” filing for earth station registrations, and the Notice does just that, offering two such options.

First, the FCC clarifies in the Notice that operators with multiple receive-only antennas at a single geographic location or address may apply to register such antennas under a single earth station application and pay just one application fee of \$435. This option should provide relief to parties with multiple co-located antennas at a single site.

Second, the FCC announced in the Notice that it will waive certain registration requirements to allow operators of multiple geographically diverse receive-only earth stations to register those stations by filing an application for a single “network.” This “network” filing option is likely to be useful only to a small number of large broadcast entities with numerous C-band downlink dishes operating in numerous locations. The FCC filing fee for a single “network” authorization is \$10,620. Although that fee is higher than the current fee of \$435 for registration of a single receive-only earth station, broadcasters who wish to register a large number of earth stations may benefit from filing under this “network” category, rather than applying to register each of their earth stations individually.

Why Register? According to NAB, the FCC’s International Bureau encourages broadcasters (and other C-band users) to register ALL of their downlink C-band antennas at a given site. Registration of all dishes provides a greater degree of interference protection against certain terrestrial microwave operations, and it is also likely to allow for reimbursement of costs associated with service restoration for each dish at such a site if the FCC at some point in the future reallocates the 3.7 – 4.2 GHz spectrum band (which earth stations use) to other users and implements a reimbursement process.

As we have previously advised, registration applications must be filed through the FCC’s IBFS (International Bureau Filing System) filing platform. Also, if you have a current registration for your receive-only dish(es), you can make data corrections and similar modifications by October 17, 2018. The FCC has waived certain registration requirements (most significantly, the frequency coordination requirement) during this limited window to make the process faster, cheaper, and easier.

Again, the registration filing window has been extended and will now close on October 17, 2018.

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

BROOKS, PIERCE, McLENDON,
HUMPHREY & LEONARD, L.L.P.

Mark J. Prak
Marcus W. Trathen
David Kushner
Coe W. Ramsey
Charles F. Marshall
Stephen Hartzell
Julia C. Ambrose
Elizabeth E. Spainhour
J. Benjamin Davis
Timothy G. Nelson
Amanda M. Whorton

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