



Virginia Association of Broadcasters Legal Review



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Legal Memorandum

Four-Month Countdown: [All Virginia Radio Stations](#) Must File License Renewal Applications This Summer!

A mere four months from now—i.e., by June 1, 2019—all radio stations licensed to communities in Virginia will be required to file license renewal applications. This memorandum is not intended to cover the full range of issues and action items that are implicated by the license renewal process. This memorandum is merely a reminder that Virginia radio stations will need to start gearing up for the license renewal process soon, if they haven't already.

Each station's license renewal application (FCC Form 303-S) and Broadcast Equal Employment Opportunity Program Report (FCC Form 396) must be electronically filed with the FCC no later than June 1, 2019. Two months prior to the June 1 filing deadline, stations are required to commence their on-air pre-filing announcements, which will need to be repeated on a schedule dictated by the FCC's rules (the content of the announcements is also dictated by the FCC's rules). Thus, the license renewal process really gets underway on April 1.

In the coming months, the Association will be offering a radio license renewal webinar for Virginia radio stations and will be distributing a license renewal guide. We have been advised by the FCC Staff that renewal applications will be filed through the FCC's LMS (Licensing and Management System) platform instead of the FCC's CDBS (Consolidated Database System) platform (where they were filed in previous cycles). Thus, the FCC Staff is in the process of converting the renewal application form (Form 303-S) for use in LMS, but the form is not yet electronically available in LMS.

License renewal is obviously a critical exercise for all stations. We will be following up in the coming weeks with more detailed information and resources to assist Association members with this important process. For now, we just want to be sure that it is on your radar for 2019, and, if you really want an action item to tide you over, you would be well-advised to engage in a careful,

detailed review of your online public inspection file to ensure that your records and documents are complete and compliant.

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

Tim Nelson, Editor

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