



# Virginia Association of Broadcasters Legal Review



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## Legal Memorandum

### **\*\* Important Radio Station License Renewal Reminder \*\***

#### Final License Renewal Pre-Filing Announcement for Virginia Radio Stations Must Air on May 16

We write with a reminder for Virginia radio stations that the final license renewal pre-filing announcement must be broadcast tomorrow, on **May 16, 2019**. In addition, within seven days of the broadcast of the last required pre-filing announcement, by **May 23, 2019**, such stations must place a statement certifying compliance with the pre-filing announcement requirement in the station's online public inspection file.

As we've reported, at license renewal time, broadcast stations are required to broadcast pre-filing (and post-filing) renewal announcements designed to alert listeners to the fact that the FCC will be considering their application for license renewal.

*Timing of Pre-Filing Announcements.* Virginia radio stations should have already aired three of the required four pre-filing announcements—on April 1, April 16, and May 1. At least two of the four pre-filing announcements must air between 7:00 a.m. and 9:00 a.m. and/or 4:00 p.m. and 6:00 p.m. local time. So, if your station has only aired one pre-filing announcement during those time windows, tomorrow's final pre-filing announcement must air during one of them.

*Content of Pre-Filing Announcements.* In terms of content, recall that the pre-filing announcements must contain the following text:

*On [date of last license renewal grant], [station's call letters] was granted a license by the Federal Communications Commission to serve the public interest as a public trustee until October 1, 2019.*

*Our license will expire on October 1, 2019. We must file an application for renewal with the FCC by June 3, 2019. When filed,*

*a copy of this application will be available for public inspection at [www.fcc.gov](http://www.fcc.gov). It contains information concerning this station's performance during the last eight years prior to October 1, 2019.*

*Individuals who wish to advise the FCC of facts relating to our renewal application and to whether this station has operated in the public interest should file comments and petitions with the FCC by September 3, 2019.*

*Further information concerning the FCC's broadcast license renewal process is available at [station's studio address] or may be obtained from the FCC, Washington, D.C. 20554.*

Stations that have not received a renewal grant since the filing of their previous renewal application should use the following paragraph in their pre-filing (and post-filing) announcements in lieu of the first paragraph of each set forth above:

*[Station's call letters] is licensed by the Federal Communications Commission to serve the public interest as a public trustee.*

*Certificate of Broadcast of Announcements.* A certificate of broadcast of the pre-filing (and post-filing) announcements must be signed and placed in the station's online public inspection file after each of the last pre-filing announcements and post-filing announcements are broadcast and by no later than 7 days after such broadcasts. For Virginia radio stations, that certification must be placed in a station's online public inspection file no later than **May 23, 2019**.

The pre-filing announcement certification must include (1) a statement indicating the dates and times that each of the pre-filing notices was broadcast, and (2) copies of the text of each announcement.

*If Your Station Hasn't Already Aired Three Pre-Filing Announcements . . . .* If you are a Virginia radio station and you haven't already aired at least three pre-filing announcements, we strongly recommend you contact your communications counsel immediately or call VAB's FCC hotline at 434-977-3716.

*Due Date for License Renewal Applications (and Accompanying EEO Report).* Please keep in mind that license renewal applications for Virginia radio stations are due no later than **June 3, 2019**.

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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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