



# Virginia Association of Broadcasters Legal Review



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## Legal Memorandum

FCC Reminds All Virginia Radio Stations that  
License Renewal Applications Must be Filed This Summer;  
On-Air Announcements Must Begin in LESS THAN TWO WEEKS!

**\* ASSOCIATION WEBINAR SCHEDULED FOR WEDNESDAY, MARCH 20<sup>th</sup> \***

The FCC recently released a [Public Notice](#) (“Notice”) reminding broadcasters of the rapidly approaching license renewal application filing deadline of June 1, 2019, for all radio stations licensed to communities in Virginia. The Notice also reminds licensees of Virginia radio stations that the renewal process really begins in earnest much sooner than that – in less than two weeks – with stations’ on-air, pre-filing announcements.

(Note: this memorandum is not intended to cover the full range of issues and action items that are implicated by the license renewal process. Rather, this memorandum is intended to remind Virginia radio stations to prepare for the license renewal process soon, if they aren’t already.

As mentioned, the first license renewal-related deadline is less than two weeks away! Stations are required to commence their on-air, pre-filing announcements on April 1<sup>st</sup>, 2019. The content of, and on-air schedule for, the pre-filing announcements are dictated by the FCC’s rules.

VAB Broadcaster Association Members can get much more information regarding the license renewal process, including the requirements for the on-air, pre-filing announcements, by attending the Association’s free Radio License Renewal Webinar scheduled for 10 a.m. EST on Wednesday, March 20<sup>th</sup>. Stations wishing to participate can do so using the following information:

Dial-in Number: 888-392-4564

Participant code: 9142132

URL: <https://web.telspan.com/go/mdcd/radiolicenserenewal>

In the meantime, however, broadcasters will want to keep in mind the following as they prepare to air their first pre-filing announcement on April 1<sup>st</sup>:

- Stations must make four on-air, pre-filing announcements – on the following specific dates: April 1, April 16, May 1, and May 16, 2019.
- The announcements must contain FCC-prescribed text, with station-specific information inserted.
- At least two of the four announcements must air between 7:00 a.m. and 9:00 a.m. and/or between 4:00 p.m. and 6:00 p.m. local time.
- Stations must upload a Pre-Filing Announcement Certification to their online public inspection file by May 23, 2019.

The FCC's Notice reminds licensees that failure to comply with the pre-filing announcement requirements could result in a delay in the processing of a license renewal application.

*Some License Renewal Application Basics.* Beyond the pre-filing announcement requirement, here are a few license renewal items to keep in mind:

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. 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). 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.

The FCC's Notice states that license renewal applications may be filed on or after (but not before) May 1, 2019. The Media Bureau intends to release further guidance and instructions in the next several weeks.

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.

We hope you'll join us for the webinar on March 20, at 10 a.m. EST.

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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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