



Virginia Association of Broadcasters Legal Review



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Legal Memorandum

Kid TV Reporting Update: Media Bureau Establishes **December 17, 2019**, Deadline to Amend Existing or File Outstanding Quarterly Children's Television Programming Reports

If your stations need to amend—or belatedly file—any *quarterly* Kid TV Reports with the Commission, you need to do so no later than **December 17, 2019**. That's according to a [Public Notice](#) (the "Notice") released late last week by the Media Bureau, which establishes the deadline for any such amendments or filings.

As broadcasters will recall, the Commission released a long-anticipated Report and Order (the "Order") in July modernizing the children's television programming rules. The Order's new rules include a transition to annual, rather than quarterly, report filing (among other things). Accordingly, broadcasters' third quarter 2019 Children's Reports were the last *quarterly* reports to be filed (they were due to be filed October). The next reports will be the first *annual* Children's Reports to be filed; they're due between January 1 and January 30, 2020, and they will encompass a reporting period from September 16, 2019, to December 31, 2019.

Per the Notice, in order to facilitate the filing of the new annual Children's Report, the Commission's Licensing and Management System ("LMS") will no longer be able to accept quarterly reports or allow broadcasters to amend previously filed quarterly reports after the December 17, 2019, deadline. Broadcasters should therefore take the next few weeks to ensure that (1) all of their currently filed quarterly Children's Reports are accurate (i.e., do not need to be amended); and (2) there are no missing reports (i.e., that no required quarterly filing was missed).

The Notice explains that any station that discovers it needs to amend or file a quarterly report *after* the December 17, 2019, deadline, must (when amending or filing such quarterly report) upload an explanatory document to its online public information file and place the document in the "Children's Reports" section under the folder entitled "Additional Documents." Further, if a

station has to upload such an explanatory document, the station **must also include an exhibit as part of its license renewal application** in which it notes that the explanatory document has been uploaded to the station's online public inspection file.

Due to the limited period of time between now and December 17, 2019, broadcasters may wish to consult with legal counsel in order to ensure (for the last time, we hope!) that their quarterly Children's Reports spanning the current license term comply with Commission requirements.

Tim Nelson, Editor

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