

ALERT

June 1, 2020 FCC EEO Deadlines Impacting Broadcast Stations in AZ, ID, MD, MI, NV, NM, OH, UT, VA, WV, WY, & DC

May 1, 2020

Annual EEO Public File Report

Radio and television station employment units (SEUs) located in **Arizona, Idaho, Maryland, Michigan, Nevada, New Mexico, Ohio, Utah, Virginia, West Virginia, Wyoming, and the District of Columbia** with five or more full-time employees must prepare by Monday, June 1, 2020, an annual EEO Public File Report (PFR). The report must be posted on the website belonging to each station in the SEU and uploaded to its online public inspection file at the Federal Communication Commission's (FCC's or Commission's) website.

Note: It is the licensee's responsibility to ensure the PFR is uploaded to the online public inspection file in a timely fashion. As a practical matter, the FCC receives an electronic date stamp when items are posted to the online public file (and so it is clear to FCC staff if they are posted late).

The PFR should summarize the SEU's recruitment activity from June 1, 2019 through May 31, 2020, including full-time positions filled, the recruitment sources used to advertise those job openings, and the total number of interviewees and hires produced by each recruitment source. The PFR must also include a summary of the SEU's recruitment initiatives.

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Practice Areas

Media
Telecom, Media & Technology

Schedule 396 Broadcast EEO Program Report

Television SEUs in **Maryland, Virginia, West Virginia, and the District of Columbia** and radio SEUs in **Michigan and Ohio** must apply for license renewal on or before Monday, June 1, 2020. A critical component of the Commission's license renewal process is the Schedule 396 Broadcast EEO Program Report, which must be submitted online prior to the filing of the Schedule 303-S Application for Renewal of Broadcast Station License.

Schedule 396 requires licensees to report discrimination complaints and, for SEUs with five or more full-time employees, provide a narrative description of their outreach efforts, identify the individual with overall EEO responsibility at the SEU, and submit PFRs covering June 1, 2018 – May 31, 2019 and June 1, 2019 – May 31, 2020. Once filed, the FCC will automatically upload a copy of the Schedule 396 to the FCC-hosted online public inspection file belonging to each station in the employment unit.

If you have any questions about the annual PFR, the Schedule 396, or FCC EEO compliance in general, please contact the Wiley attorneys listed on this alert.