

ALERT

October 2, 2017 FCC EEO Deadlines

September 5, 2017

Annual EEO Public File Report

Radio and television station employment units (SEUs) located in **Alaska, Florida, Guam, Hawaii, Iowa, Missouri, Oregon, Puerto Rico, American Samoa, Washington and the Virgin Islands** with five or more full-time employees must prepare by **Monday October 2, 2017** an annual EEO Public File Report (PFR). The report must be placed in the public inspection file and posted on the website belonging to each station in the SEU. (For full-power and Class A television stations as well as commercial radio stations in the Top 50 Nielsen markets, the PFR must be uploaded to the online public inspection file hosted by the FCC.)

The PFR should summarize the SEU's recruitment activity from October 1, 2016 through September 30, 2017, 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.

FCC Form 397 Broadcast Mid-Term Report

Licensees that have reached the mid-point of their eight-year license term must file a FCC Form 397 Broadcast Mid-Term Report for a substantive review of their recruitment activity. Television SEUs with five or more full-time employees in **Iowa and Missouri** and radio SEUs with 11 or more full-time employees in **Alaska, Guam, Hawaii, Oregon, American Samoa and Washington** must file their Forms 397 by **Monday, October 2, 2017**.

Authors

Kathleen A. Kirby
Partner
202.719.3360
kkirby@wiley.law

Practice Areas

Media
Telecom, Media & Technology

The Form 397 requires filers to identify the individual responsible for EEO matters and to submit the SEU's two most recent PFRs as attachments. Those SEUs facing the upcoming October 2 deadline must include PFRs covering October 1, 2015 – September 30, 2016 and October 1, 2016 – September 30, 2017. Once filed with the FCC, the Form 397 must be placed in the public inspection file of each station in the SEU. For stations with online public inspection files hosted by the FCC (mandatory for full-power and Class A television stations and commercial radio stations in the Top 50 Nielsen markets), the FCC will automatically upload a copy of the Form 397 to the station's online public file.

If you have any questions about the annual PFR, the Form 397 or FCC EEO compliance in general, please contact the Wiley Rein attorneys listed on this alert.