

Shared Services Agreements Must be Uploaded to the Online Public File by September 19, 2018

September 10, 2018

Shared Services Agreements (SSA) entered into on or before March 23, 2018 must be uploaded to the public file by September 19, 2018. On March 23, 2018, new rules went into effect that obligate commercial stations to disclose existing SSAs by uploading a copy to their online public file. Stations were provided with six months to come into compliance. Going forward, any new SSAs must be uploaded to the online public file “in a timely fashion.” Stations should place these agreements in the folder labeled “Shared Services Agreement” in the online public file. Stations are allowed to redact confidential or proprietary information from the uploaded copy, although, upon request, an unredacted copy must be provided to the FCC.

As a reminder, the Commission’s definition of a SSA is very broad, and includes: “any agreement or series of agreements, whether written or oral, in which (1) a station provides any station-related services, including, but not limited to, administrative, technical, sales, and/or programming support, to a station that is not directly or indirectly under common *de jure* control permitted under the Commission’s regulations; or (2) stations that are not directly or indirectly under common *de jure* control permitted under the Commission’s regulations collaborate to provide or enable the provision of station-related services, including, but not limited to, administrative, technical, sales, and/or programming support, to one or more of the collaborating stations.” (Second Report and Order, para. 337)

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