

ALERT

October 1, 2012 FCC EEO Deadlines

September 10, 2012

Certain radio and television stations face an upcoming Federal Communications Commission (FCC or Commission) Equal Employment Opportunity (EEO) annual reporting deadline on Monday, October 1, 2012:

Annual EEO Public File Report

Radio and television station employment units (SEUs) located in the **Virgin Islands, Florida, Puerto Rico, Iowa, Missouri, Alaska, Guam, Hawaii, Oregon, Samoa and Washington** with five or more full-time employees must prepare and place in their public inspection file(s) and post on their website(s) by **Monday, October 1, 2012** an annual EEO Public File Report (PFR).

The PFR should summarize the SEU's recruitment activity from October 1, 2011 through September 30, 2012, including full-time positions filled, the recruitment sources used to advertise those job openings and the total number of interviewees and hirees produced by each recruitment source. The PFR must also include a summary of the SEU's recruitment initiatives.

The next round of broadcast license renewal applications are due by October 1, 2012 as well, which requires the filing of this key EEO report for certain radio and television stations:

FCC Form 396 Broadcast EEO Program Report

Radio stations in **Iowa and Missouri** and television stations in **Florida, Puerto Rico and the Virgin Islands** must apply for license renewal on or before **Monday, October 1, 2012**. A critical component of the Commission's license renewal process is the Form 396 Broadcast EEO Program Report, which must be submitted to the FCC, electronically, prior to the filing of the Form 303-S Application for

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Renewal of Broadcast Station License. The Form 396 requires applicants to report discrimination complaints and, for SEUs with five or more full-time employees, to submit PFRs for 2011 (covering October 1, 2010 - September 30, 2011) and 2012 (covering October 1, 2011 - September 30, 2012).

If you would like a copy of our renewal primer, including information on the EEO component of the application, or should you have any questions about FCC EEO compliance, please contact the Wiley Rein attorneys listed below.