

ALERT

August 2, 2021 FCC EEO Deadlines for Stations in NC, SC, IL, WI, CA

July 6, 2021

Annual EEO Public File Report

Radio and television station employment units (SEUs) located in **North Carolina, South Carolina, Illinois, Wisconsin, and California** with five or more full-time employees must prepare by Monday, August 2, 2021, 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 Communications 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 by the deadline. Files receive an electronic date/time stamp when uploaded to the online public file, making it clear to FCC staff if they are posted late.

The PFR should summarize the SEU's recruitment activity from August 1, 2020 through July 31, 2021, 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.

Schedule 396 Broadcast EEO Program Report

Television SEUs in **Illinois and Wisconsin** and radio SEUs in **California** must submit a license renewal application by Monday, August 2, 2021. Prior to submitting the license renewal application,

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each SEU must file a Schedule 396 Broadcast EEO Program Report.

The 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 the time period from August 1, 2019 – July 31, 2020 and August 1, 2020 – July 31, 2021. Once filed, the FCC will automatically upload a copy of the Schedule 396 to the online public inspection file for 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.