

**ALERT**

# Compliance with New FCC Broadcast Foreign Sponsorship Identification Requirements Required as of March 15, 2022

---

March 15, 2022

On March 15, 2022, the Federal Communications Commission (FCC)'s broadcast sponsorship identification requirements for leased programming provided by foreign governmental entities, adopted almost a year ago, will go into effect. The new rules, summarized here, were previously delayed in their effectiveness as a result of the need for review and approval by the Office of Management and Budget (OMB). An FCC News Release and Federal Register notice issued today announces that the FCC has received OMB approval.

As of March 15, 2022, broadcasters are legally required to comply with the new rules. The reasonable diligence and disclosure requirements apply to all programming broadcast pursuant to a lease that is entered into on or after March 15. With respect to existing arrangements, compliance with the new rules is required within six months, by September 15, 2022.

Please contact any of the authors on this alert, or the Wiley attorney handling your station matters, if you have any questions about the new foreign sponsorship identification rules or your plan for compliance. Wiley is at the forefront of issues related to foreign involvement in U.S. communications businesses through our Telecom, Media & Technology (TMT), International Trade, and National Security Practices, including our twenty-year old FARA Practice.

## Authors

---

Kathleen A. Kirby  
Partner  
202.719.3360  
kkirby@wiley.law  
Eve Klindera Reed  
Partner  
202.719.7404  
ereed@wiley.law

## Practice Areas

---

Foreign Agents Registration Act (FARA)  
Media  
National Security  
Telecom, Media & Technology