

ALERT

FCC Delays (Again) Compliance Date for Expanded Foreign Government-Sponsored Programming Rules Until June 7, 2026

December 5, 2025

On December 5, 2025, the Federal Communications Commission (FCC) issued a Public Notice further delaying the deadline by which broadcasters must comply with the expanded rules concerning the identification of foreign government-sponsored programming (the FSID Rules) until June 7, 2026. As we explained in a previous alert, the FCC had previously set December 8, 2025, as the compliance deadline.

In the meantime, broadcasters still must meet certain obligations concerning foreign government-sponsored programming, including to:

- Tell third parties leasing programming on their stations about the FSID Rules;
- Ask any such third party whether it is a foreign governmental entity or an agent of one;
- Ask any such third party whether anyone further back in the production or distribution chain is a foreign governmental entity or an agent of one; and
- Document those inquiries and investigations.

Beginning on June 7, 2026, the FSID Rules will also:

- Apply more broadly to include advertising (including political issue advertising and paid public service announcements), except for (1) advertising for commercial products and services that is exempt from the sponsorship identification rules generally (i.e., because it states the advertiser's corporate name or product name and it is clear that the mention is a

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sponsorship identification), and (2) political candidate advertising; and

- Require broadcasters to choose from two FCC-specified options to satisfy their duty of inquiry, consisting of either (1) a certification requirement (which can be satisfied using separate FCC-approved templates for the licensee and the lessee/program purchaser), or (2) a requirement to obtain from the lessee screenshots demonstrating that the party purchasing airtime is not listed in government databases that compile foreign agents under the Foreign Agents Registration Act and the FCC's U.S.-based foreign media outlet report.

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, as well as our FARA Practice. If you have any questions about the FSID Rules, please contact the attorney who regularly handles your station matters or one of the attorneys listed on this alert.