

ALERT

FCC Systems Back Online Post-Shutdown; Media Bureau Announces Revised Deadlines

November 18, 2025

The FCC's systems and databases that were affected by the government shutdown are available for use as of November 18, 2025.

In four separate Public Notices released on November 17, 2025, the FCC announced revised deadlines for: (1) Media Bureau filings in the Licensing and Management System (LMS); (2) political programming uploads to the Online Public Inspection File (OPIF); (3) applications for Class A, LPTV, and TV Translator major change applications and new station applications; and (4) all other filings and notifications. Below, we summarize the new deadlines applicable to broadcasters.

LMS Deadlines

In the Public Notice focused on LMS, the Media Bureau announced a window for filings in the week after LMS becomes available. Any material submitted in LMS between 12:00 a.m. ET on November 18, 2025, and 11:59 p.m. ET on November 25, 2025, will be deemed to be filed on November 25, 2025. Normal processing with daily cutoffs will begin on November 26, 2025.

For deadlines that occurred between October 1, 2025, and November 18, 2025, the Media Bureau clarified as follows:

- **Silent Stations/312(g)** – Any facility whose 12 months of non-operation ended between October 1, 2025, and November 18, 2025, must commence authorized broadcast operations by 11:59 p.m. on November 18, 2025 to avoid expiration of the license under Section 312(g).
- **Construction Permits** – Any permittee whose construction permit expired between October 1, 2025, and November 18,

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2025, must file a license to cover or request tolling by November 28, 2025.

- **Special Temporary Authority (STA)** – Any STAs that would have expired from October 1, 2025, through December 4, 2025, are extended until December 5, 2025. Licensees must file necessary extension requests or resumption notices by 11:59 p.m. ET on December 5, 2025.

Political File Deadlines

In a separate Public Notice focused on political programming records, the Media Bureau adopted a staggered schedule for licensees to upload records to the OPIF relating to requests to purchase broadcast time received between October 1, 2025 and November 12, 2025:

- Stations located in New York, New Jersey, and Connecticut should upload files between November 19, 2025, and November 26, 2025.
- Stations located in Virginia, Maryland, West Virginia, and the District of Columbia should upload files between December 1, 2025, and December 8, 2025.
- Stations located in California should upload files between December 9, 2025, and December 16, 2025.
- Stations located in all other states and territories should upload files between December 17, 2025, and December 24, 2025.

Any documents that would have been uploaded between November 13, 2025, and November 17, 2025, can also be uploaded on the above schedule. Any new documents generated after November 17, 2025, should be uploaded “immediately” (by the next business day).

Class A, LPTV, and TV Translator Major Change Applications

The FCC previously announced plans to lift the current freeze on major changes for Class A television, low power television (LPTV), and TV translator stations and for applications for new LPTV and TV translator applications beginning in October 2025. Because several of those deadlines occurred during the shutdown, the FCC has clarified that all major modification applications remain frozen. Minor modification applications (including displacement applications) may still be filed.

In a third November 17 Public Notice, the Media Bureau announced revised freeze and filing opportunities dates as follows:

- December 11, 2025, 6:00 p.m. ET: The Bureau will institute a freeze on all minor change applications for Class A, LPTV, and TV translator stations.
- December 18, 2025, 12:01 a.m. ET: The Bureau will lift the major modification filing freeze for Class A, LPTV, and TV translator stations, in addition to the temporary freeze on minor modification and displacement applications. Applications will be accepted on a first-come, first-served basis and can include relocations of no more than 121.0 kilometers from the station’s antenna reference coordinates. The freeze on minor change applications will also be lifted at this time.

- January 29, 2026, 6:00 p.m. ET: The Bureau will institute a freeze on all major change applications for Class A, LPTV, and TV translator stations.
- March 12, 2026, 6:00 p.m. ET: The Bureau will institute a freeze on all minor change applications for Class A, LPTV, and TV translator stations.
- March 19, 2026, 12:01 a.m. ET: The Bureau will begin accepting all major and minor change applications on a first-come, first-served basis, in addition to applications for new LPTV and TV translator stations. The applications will not be limited by geographic restrictions or other limitations beyond the existing parameters in parts 73 and 74 of the Commission's rules. The freeze on minor change applications will also be lifted at this time.

Other Deadlines

In a fourth Public Notice, the FCC addressed revised filing deadlines for other systems and databases:

- **Quarterly Issues/Programs Reports** – All quarterly issues/programs reports that were due to be uploaded to the Online Public Inspection File (OPIF) by October 10, 2025, now have a deadline of December 1, 2025. The Media Bureau encourages licensees to file before this deadline, if possible.
- **Annual EEO Public File Reports** – EEO Annual Reports that were supposed to be uploaded to the OPIF by October 1, 2025, now have a deadline of November 24, 2025. The Media Bureau encourages licensees to file before this deadline, if possible.
- **EEO Audit Responses** – Broadcast EEO audit responses that were due by October 17, 2025, now have a deadline of November 24, 2025. This includes both materials that were to be uploaded to the OPIF and confidential information that was to be submitted separately via email.
- **Non-Broadcast Wireless Applications** – Applications and notifications due to be submitted in the Universal Licensing System (ULS) between October 1, 2025, and December 5, 2025, are now due on December 5, 2025. Additionally, all ULS filings that applicants attempted to file on October 1, 2025, will be considered received on November 18, 2025.
- **Other Filings** – Other filings that were due between October 1, 2025, and November 17, 2025, are due by November 18, 2025.
- **Responsive Pleadings** – Where reply comments or responsive pleadings are permitted with respect to initial filings affected by the shutdown, the reply or responsive pleadings will be extended for the period of time equivalent to the extension provided for the initial filing, such that the time between the initial filing and the reply/response will be the same. The FCC provided an example that if comments in a rulemaking were due on October 15, 2025 and reply comments were due 15 days later, the comments are now due on November 18, 2025, and the reply comments are due 15 days later, or on December 3, 2025.

If you have any questions on these matters, please contact the Wiley attorney who handles your station's matters.