

# Reminder: Broadcasters Must Comply by June 7 with Expanded FCC Foreign Government-Sponsored Programming Rules

May 21, 2026

A June 7 deadline is approaching for broadcasters to comply with expanded rules concerning the identification of foreign government-sponsored programming (the FSID Rules). That compliance date was announced by the Federal Communications Commission (FCC) last December, as we explained previously.

Since 2022, broadcasters have had certain obligations concerning foreign government-sponsored programming, including to:

- Tell third parties leasing programming time 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), but excluding (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 sponsorship identification), and (2) political candidate advertising; and

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## Practice Areas

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

- 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 met by using FCC-approved templates for the licensee and the lessee/program purchaser), or (2) obtaining, from the lessee, screenshots from government databases that list foreign agents under the Foreign Agents Registration Act and the FCC's U.S.-based foreign media outlet report showing that the party purchasing airtime is not listed in those databases.

For political issue ads, licensees can instead use the National Association of Broadcasters Political Broadcast Agreement Form for Non-Candidate/Issue Advertisements (commonly referred to as the NAB PB-20, and which we understand will be released soon) to comply with the certification requirement.

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