

FCC Legal Compliance Calendar

Requirements for full-power NCE radio stations

Compiled by Pacifica Network and the National Federation of Community Broadcasters
with oversight from Foster Garvey.

If you are new to the process of FCC reporting compliance, see page 6 for introductory info.

Emergency Alert System (EAS) Tests & Monitoring

Each state has its own EAS schedule. We recommend that you identify your state's EAS date requirements and Stations should keep up with their particular EAS requirements.

EAS logs do not have to be printed out, but it is advisable. If the EAS logs are not printed and the station gets inspected by the FCC (or through an ABIP), someone at the station during the inspection needs to know how to access the logs. EAS logs should be periodically reviewed to assure that the station is receiving all monitoring assignments and should be retained for at least two years.

January

- 10th — Prepare and upload Quarterly FCC Issues/Programs List to each station's Online Public Information File for the 4th quarter of the previous year.
- 10th — Prepare and upload disclosure report of any Third-Party Fundraising aired during the 4th quarter of the previous year.
- 10th — Prepare and upload disclosure report of any Foreign-Government Provided Programming aired during the 4th quarter of the previous year.
- 30th — Prepare and upload FCC Donor List to each station's Online Public Information Files.

February

- 1st — Prepare and upload Annual EEO Report for Station Employment Units with 5 or more full-time employees in Arkansas, Kansas, Louisiana, Mississippi, Nebraska, New Jersey, New York, and Oklahoma.
- 30th — Prepare and upload FCC Donor List to each station's Online Public Information Files

March

- 30th — Prepare and upload FCC Donor List to each station's Online Public Information Files. Upload identities of any specific-program underwriters to Public File.

April

- 1st — Prepare and upload Annual EEO Report for Station Employment Units with 5 or more full-time employees in Delaware, Indiana, Kentucky, Pennsylvania, Tennessee, and Texas.
- 10th — Prepare and upload Quarterly FCC Issues/Programs List to each station's Online Public Information File for the 1st quarter of the current year.
- 10th — Prepare and upload disclosure report of any Third-Party Fundraising aired during the 1st quarter of the current year.
- 10th — Prepare and upload disclosure report of any Foreign-Government Provided Programming aired during the 1st quarter of the current year.
- 30th — Prepare and upload FCC Donor List to each station's Online Public Information Files.

May

- 30th — Prepare and upload FCC Donor List to each station's Online Public Information Files.

June

- 1st — Prepare and upload Annual EEO Report for Station Employment Units with 5 or more full-time employees in Arizona, DC, Idaho, Maryland, Michigan, Nevada, New Mexico, Ohio, Utah, Virginia, West Virginia, and Wyoming.
- 30th — Prepare and upload FCC Donor List to each station's Online Public Information Files.

July

- 10th — Prepare and upload Quarterly FCC Issues/Programs List to each station's Online Public Information File for the 2nd quarter of the current year.
- 10th — Prepare and upload disclosure report of any Third-Party Fundraising aired during the 2nd quarter of the current year.
- 10th — Prepare and upload disclosure report of any Foreign-Government Provided Programming aired during the 2nd quarter of the current year.
- 30th — Prepare and upload FCC Donor List to each station's Online Public Information Files.

August

- 1st — Prepare and upload Annual EEO Report for Station Employment Units with 5 or more full-time employees in California, Illinois, North Carolina, South Carolina, and Wisconsin.
- 30th — Prepare and upload FCC Donor List to each station's Online Public Information Files.

September

30th — Prepare and upload FCC Donor List to each station's Online Public Information Files.

October

1st — Prepare and upload Annual EEO Report for Station Employment Units with 5 or more full-time employees in Alaska, American Samoa, Florida, Guam, Hawaii, Iowa, Missouri, Northern Mariana Islands, Oregon, Puerto Rico, US Virgin Islands, and Washington.

10th — Prepare and upload Quarterly FCC Issues/Programs List to each station's Online Public Information File for the 3rd quarter of the current year.

10th — Prepare and upload disclosure report of any Third-Party Fundraising aired during the 3rd quarter of the current year.

10th — Prepare and upload disclosure report of any Foreign-Government Provided Programming aired during the 3rd quarter of the current year.

30th — Prepare and upload FCC Donor List to each station's Online Public Information Files.

November

30th — Prepare and upload FCC Donor List to each station's Online Public Information Files.

December

No later than December 1: *Only in odd numbered years. (2025, 2027, etc.)* Biennial Ownership Reports for all stations (see below).

1st — Prepare and upload Annual EEO Report for Station Employment Units with 5 or more full-time employees in Alabama, Colorado, Connecticut, Georgia, Maine, Massachusetts, Minnesota, Montana, New Hampshire, North Dakota, Rhode Island, South Dakota, and Vermont.

30th — Prepare and upload FCC Donor List to each station's Online Public Information Files.

EXPLANATIONS, OTHER REPORTS, and HELPFUL LINKS

Quarterly Issues/Programs Lists: Each quarter, all stations must prepare a list of the most significant programs which addressed issues of concern to the station's community of license during the preceding three-month period. The list must identify the issues that were deemed to be important, as well as a brief narrative description of the programming that addressed these issues. Each entry on the Quarterly Issues/Programs List must contain the following elements: (1) the issue addressed; (2) the issue-responsive programming, including its title and a brief narrative description; (3) the date(s) each program was aired; (4) the time(s) each program was aired; and (5) the duration of each program.

Donor Lists: Only those underwriters who support locally produced specific programs need to be reported. General donation, grants, and station support do not need to be reported. However, some stations submit regular reports of all their underwriters anyway, for purposes of transparency. This category does not include underwriting for syndicated programs that do not fund your station. The Donor List must contain (1) the name of the program aired, (2) the date and time that the program aired, and (3) the name of the donor/sponsor. Each station must have Donor list covering programs aired for the last two years.

Ownership Reports: A **Biennial Ownership Report** is due in each odd-numbered calendar year (2025, 2027, etc.), in a filing window from October 1 until November 30 of that year. All stations report this data as of an October 1 "snapshot," so that the FCC can publish and analyze overall totals.

A **Non-Biennial Ownership Report** is required to be filed within 30 days of the acquisition of a new license or permit, for the purpose of updating the station's profile to include the new facility. This includes when a station is purchased or donated, as well as when the FCC issues a permit or license for a new station.

License Renewal Applications: Applications to renew your license must be filed every eight years. Deadlines are spaced across the States and Territories so that FCC staff can keep a manageable workflow. The application filing deadline is the first day of the fourth month ahead of the date that a station's current license is set to expire. (A pending but not granted timely filed renewal application extends the license until the FCC acts on the application.)

A late-filed license renewal application potentially exposes the station to a fine, and delays FCC staff processing the renewal application. The FCC does not notify the licensee that its license is coming up for renewal.

When applying for your license renewal, you are required to provide on-air public notice announcements of the filing of the application. When these are completed, you are required to upload a certification to the FCC Online Public File that they have been completed.

Annual Equal Employment Opportunity Reports: An Equal Employment Opportunity (EEO) report must be uploaded every year to the Online Public Information Files by the anniversary of the filing deadline for station renewal. In addition to uploading an Annual EEO Report on the yearly anniversary of the filing deadline for station renewal, the station also must link the current Annual EEO Report of the station's website.

A full-time employee is an employee that is paid for 30 hours or more per week. Stations with fewer than five full-time employees do not need to prepare an Annual EEO Report.

All hirings job-searches for full-time positions (30 hours or more per week) must be documented on the Annual EEO Report. Promotions from within do not need to be documented.

If an Annual EEO Report is required, you must also include the station's EEO employment "initiatives" involving outreach for training, attendance at job fairs, Internships with schools, training for employees, EEO trainings for staff and employees etc. Specifics of what occurred during the reporting period should be included, including dates, locations, number of people involved (no names). It is a good practice to include as many initiatives as possible. We recommend that you talk to your FCC counsel to complete this correctly.

IF THIS IS NEW FOR YOU

SCOPE OF THIS CALENDAR: This calendar applies to noncommercial educational radio stations. Most of these requirements DO NOT APPLY to Class D FM (Alaska) and Low Power FM stations.

ON-LINE ACCESS

the FRN: To do anything at FCC, a broadcaster must have a Federal Registration Number (FRN), a ten-digit number with a user-created password. Keep your FRN and password in several safe and known places. (Much time is wasted every day by broadcasters and their advisers, trying to recover lost passwords!) New FRNs can be obtained at the following link:

<https://apps.fcc.gov/coresWeb/regEntityType.do>

The OnLine Public Information File or "OPIF": Each NCE station must maintain its FCC Online Public Information File. You are required to upload documents to this public-facing FCC website.

- Your station's Online Public Information File is available at <https://publicfiles.fcc.gov/>. At that link you can click on "View the complete list of items that must be placed in the file."
- Login to and maintain your file at <https://publicfiles.fcc.gov/admin/>

PRIMARY SOURCE

Items to be included in the public file of noncommercial educational stations are listed in an FCC Rule, 47 C.F.R. Section 73.3527(e). <https://www.law.cornell.edu/cfr/text/47/73.3527>.

FCC Media Bureau, Audio Division: <https://www.fcc.gov/media/radio/audio-division>;
phone 202-418-2700.

MAINTAINING AN ACTIVE REGISTRATION WITH SEVERAL FCC DATABASES:

LMS Licensing and Management System. Location where virtually all FCC radio application filings are made. User needs a Federal Registration Number (FRN) and password.

<https://enterprise filing.fcc.gov/dataentry/login.html>.

EAS (Emergency Alert System) annual national test requires pre-registration and certification of test received and rebroadcast. National tests are announced by the FCC with notifications available when you open an account in the FCC EAS Test Reporting System (ETRS).

<https://www.fcc.gov/general/eas-test-reporting-system>.

MONTHLY AND WEEKLY EMERGENCY ALERT SYSTEMS (EAS) TESTS : _

You are required to make a monthly Test (RMT) and a Required Weekly Test (RWT) [Section 11.61]. Each month, local or state Primary EAS sources will transmit test messages of the EAS digital Header Codes (three long EAS data bursts), the two-tone 8-second Attention Signal, a Test Script (audio message), and EOM codes. You must retransmit monthly tests within 15 minutes of receipt. In odd months, the tests must be conducted between 8:30 a.m. and local sunset. In even months, tests must be conducted between local sunset and 8:30 a.m. All stations must conduct tests of the EAS Header and EOM codes at least once a week on random days and times between 8:30 a.m. and local sunset. A weekly test is not required the week that a monthly test is conducted.