

ALERT

# June 1, 2015 FCC EEO Deadlines + Form 397 Mid-Term Filings Begin

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April 29, 2015

Certain radio and television stations face an upcoming Federal Communications Commission (FCC or Commission) Equal Employment Opportunity (EEO) annual reporting deadline on Monday, June 1, 2015:

## Annual EEO Public File Report

Radio and television station employment units (SEUs) located in **Arizona, Idaho, Maryland, Michigan, Nevada, New Mexico, Ohio, Utah, Virginia, West Virginia, Wyoming, and the District of Columbia** with five or more full-time employees must prepare by **Monday, June 1, 2015** an annual EEO Public File Report (PFR). The report must be placed in the public inspection file of each station in the SEU. (For full-power and Class A *television* stations, this means the PFR must be uploaded to the station's online public inspection file hosted by the FCC.) The PFR must also be posted on the website belonging to each station in the SEU.

The PFR should summarize the SEU's recruitment activity from June 1, 2014 through May 31, 2015, including full-time positions filled, the recruitment sources used to advertise those job openings, and the total number of interviewees and hires produced by each recruitment source. The PFR must also include a summary of the SEU's recruitment initiatives.

## FCC Form 397 Broadcast Mid-Term Report: New Filing Round Begins

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## Practice Areas

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Media  
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Licensees that have reached the mid-point of their eight-year license term must file a FCC Form 397 Broadcast Mid-Term Report for a substantive review of their recruitment activity. Radio SEUs with 11 or more full-time employees located in the **District of Columbia, Maryland, Virginia and West Virginia** kick off the Form 397 filing cycle on **Monday, June 1, 2015**. Radio and television stations in the remainder of the U.S. file the Form 397 on a rolling basis over a four-year period based on the state in which they are licensed on the fourth anniversary of their license renewal application filing deadline. Television stations start one year later than radio, with their Mid-Term Report filing cycle beginning June 1, 2016. (Note: Radio SEUs with ten or fewer full-time employees and television SEUs with four or fewer full-time employees are not required to submit a Form 397.)

The Form 397 requires filers to identify the individual responsible for EEO matters and to submit the SEU's two most recent PFRs as attachments. Those SEUs with a June 1, 2015 deadline must include PFRs covering June 1, 2013-May 31, 2014 and June 1, 2014-May 31, 2015. Once filed with the FCC, the Form 397 must be placed in the public inspection file of each station in the SEU.