

ALERT

December 1, 2015 FCC EEO Deadlines

November 5, 2015

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

Annual EEO Public File Report

Radio and television station employment units (SEUs) located in **Alabama, Georgia, Colorado, Minnesota, Montana, North Dakota, South Dakota, Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont** with five or more full-time employees must prepare by Tuesday, December 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 December 1, 2014 through November 30, 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

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 **Alabama and Georgia** must file the Form 397 with the FCC on or before **Tuesday, December 1, 2015**.

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Practice Areas

Media
Telecom, Media & Technology

(Note: Radio SEUs with 10 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 an December 1, 2015 deadline must include PFRs covering December 1, 2013 - November 30, 2014 and December 1, 2014 - November 30, 2015. Once filed with the FCC, the Form 397 must be placed in the public inspection file of each station in the SEU.

If you have any questions about the Form 397 or FCC EEO compliance in general, please contact Kathleen A. Kirby or Elizabeth E. Goldin.