

## 2024 Broadcasters' Calendar

### Items of Note in 2024<sup>1</sup>

- I. *Phased-In Expansion of Audio Description Requirements:* The FCC adopted rules in 2011 requiring certain broadcast television stations in Designated Market Areas (DMAs) 1-60 to provide audio description (i.e., audio-narrated descriptions of a television program's key visual elements) for a portion of the programming offered to consumers. In 2020, the FCC adopted a phased expansion of the audio description rules to DMAs 61-100, whereby the requirements would apply to an additional 10 DMAs each year, with a January 1, 2024 deadline for DMAs 91-100. In October 2023, the FCC adopted an order to continue applying the audio description requirements to an additional 10 DMAs each year until all DMAs are required to comply with these rules.
  
- II. *"Lowest Unit Charge" Periods for Political Advertisements:* Legally qualified candidates purchasing broadcast time are entitled to the "lowest unit charge" for such ad time during the 45 days before a primary, caucus, or primary runoff election and during the 60 days before a general election. During these "lowest unit charge" periods, broadcast stations must make advertising time available to legally qualified candidates at no more than their "lowest unit charge" for the same class of advertisement (i.e., length of spot, risk of preemption, daypart). Stations should monitor primary, caucus, and general election dates in their states to ensure compliance with this requirement. Note that lowest unit charge window dates for individual states are not included in this calendar.

### January 1

#### **Audio Description Requirements Extend to Nielsen Designated Market Areas 91 to 100—**

Commercial television stations affiliated with one of the top four broadcast networks and assigned to the El Paso, Paducah-Cape Girardeau-Harrisburg, Cedar Rapids-Waterloo-Iowa City-Dubuque, Burlington-Plattsburgh, Baton Rouge, Jackson (Mississippi), Ft. Smith-Fayetteville-Springdale-Rogers, Boise, South

<sup>1</sup> The deadlines in the **2024 Broadcasters' Calendar** are based on information known as of the date hereof and may or may not apply to any particular broadcaster. They are provided for general informational purposes only and should be double-checked for currency close to each pertinent date/deadline. Actions by the FCC, Congress, or the courts could affect any of these deadlines by, for example, eliminating a particular reporting/filing obligation altogether or modifying the form, content, deadline, fee, or manner of reporting/filing. It should also be noted that, as a general rule, when a deadline for filing a document *with the FCC* falls on a weekend or a federal holiday, the filing deadline shifts to the next business day. The listing below is not intended to be exhaustive of all regulatory and non-regulatory deadlines that may apply to a given broadcaster year-to-year. Accordingly, broadcasters should seek the advice of communications counsel to assure timely and proper filings. This edition of our annual Broadcasters' Calendar supersedes all prior editions and accordingly any prior editions should no longer be used.

Bend-Elkhart, or Myrtle Beach-Florence Nielsen Designated Market Areas must comply with the FCC's audio description (formerly video description) rules. Additionally, commercial television stations assigned to a DMA that was not ranked within the top 90 as of January 1, 2020 but was ranked within the top 90 DMAs as of January 1, 2023 (Chattanooga and Charleston, SC) must also come into compliance with the rules by this date.

### January 10

**Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations** must upload to their Public Inspection File by this date the Quarterly Issues/Programs List covering the period October 1, 2023 through December 31, 2023.

**Class A Television Continuing Eligibility Certification—Class A television stations** are required to maintain documentation in their Public Inspection File sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period October 1, 2023 through December 31, 2023 and upload it to their Public Inspection File.

**Quarterly Fundraising Reports—All noncommercial educational TV and radio stations** that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period October 1, 2023 through December 31, 2023 and upload it to their Public Inspection File by this date.

**Sponsorship Identification Requirements for Foreign Government-Provided Programming—All full-power radio, full-power television, and Class A television stations airing any foreign government-provided programming** during the period October 1, 2023 through December 31, 2023 which required a foreign sponsorship disclosure at the time of broadcast must upload to their Public Inspection File by this date copies of those disclosures and the name of each program in which they were included.

### January 14

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending November 30, 2023 by this date.

### January 30

**Annual Children's Television Programming Report Due—Commercial full-power and Class A television stations** must by this date file FCC Form 2100, Schedule H (formerly FCC Form 398) demonstrating their responsiveness to "the educational and informational needs of children" during calendar year 2023.

**Annual Certification of Children's Commercial Time Limitations Due—Commercial full-power and Class A television stations** must upload to their Public Inspection File by this date records "sufficient to verify compliance" with the FCC's commercial limitations in children's programming broadcast during calendar year 2023.

### January 31

**Copyright Royalty Fee: Annual Minimum Fee Statement of Account Form Due**—By this date, most commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must submit the **Minimum Fee Statement of Account Form** and the annual copyright

royalty fee to SoundExchange. January 31 is also the date by which certain noncommercial educational webcasters, such as student-run noncommercial educational stations simulcasting their programming over the Internet, may elect to pay a \$100 fee to obtain a waiver of certain reporting requirements for the upcoming calendar year. If your radio station is simulcast or rebroadcast over the Internet, we encourage you to consult counsel with regard to your obligations.

### February 1

**Annual EEO Public Inspection File Report Due—Station Employment Units that have five or more full-time employees** and are comprised of **radio and/or television stations** licensed to communities in **Arkansas, Kansas, Louisiana, Mississippi, Nebraska, New Jersey, New York, or Oklahoma** must by this date upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period February 1, 2023 through January 31, 2024. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

### February 14

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending December 31, 2023 by this date.

### March 16

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending January 31, 2024 by this date.

### April 1

**Annual EEO Public Inspection File Report Due—Station Employment Units that have five or more full-time employees** and are comprised of **radio and/or television stations** licensed to communities in **Delaware, Indiana, Kentucky, Pennsylvania, Tennessee, or Texas** must by this date upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period April 1, 2023 through March 31, 2024. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

### April 10

**Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations** must upload to their Public Inspection File by this date the Quarterly Issues/Programs List covering the period January 1, 2024 through March 31, 2024.

**Class A Television Continuing Eligibility Certification—Class A television stations** are required to maintain documentation in their Public Inspection File sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period January 1, 2024 through March 31, 2024 and upload it to their Public Inspection File.

**Quarterly Fundraising Reports—All noncommercial educational TV and radio stations** that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit

organization must generate relevant documentation for the period January 1, 2024 through March 31, 2024 and upload it to their Public Inspection File by this date.

**Sponsorship Identification Requirements for Foreign Government-Provided Programming—All full-power radio, full-power television, and Class A television stations airing any foreign government-provided programming** during the period January 1, 2024 through March 31, 2024 which required a foreign sponsorship disclosure at the time of broadcast must upload to their Public Inspection File by this date copies of those disclosures and the name of each program in which they were included.

#### April 14

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending February 29, 2024 by this date.

#### April

**EEO 1 Report**—Broadcasters that are subject to the federal Equal Employment Opportunity Commission's (EEOC) reporting requirements must file their EEO 1 Report (Form 100) annually. While the EEOC has not yet announced the filing window for the 2023 EEO-1 Component 1 data collection at the time of publication of this Calendar, filers should expect that window to open as early as **April 2024**. Private employers that have 100 or more employees at a single establishment or collectively have 100 or more employees at multiple establishments, as well as certain federal contractors, are generally subject to this requirement and must complete the report based on employment data from a single pay period during October, November, or December 2023. We encourage you to consult with counsel on the filing and visit <https://www.eeoc.gov/employers/eo-reports-surveys> for announcement of the filing window and additional background.

#### May 15

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending March 31, 2024 by this date.

#### June 1

**Annual EEO Public Inspection File Report Due—Station Employment Units that have five or more full-time employees** and are comprised of **radio and/or television stations** licensed to communities in **Arizona, the District of Columbia, Idaho, Maryland, Michigan, Nevada, New Mexico, Ohio, Utah, Virginia, West Virginia, or Wyoming** must by this date upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period June 1, 2023 through May 31, 2024. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

#### June 14

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending April 30, 2024 by this date.

## July 10

**Quarterly Issues/Programs List Due—All full-power radio, full-power television, and Class A television stations** must upload to their Public Inspection File by this date the Quarterly Issues/Programs Lists covering the period April 1, 2024 through June 30, 2024.

**Class A Television Continuing Eligibility Certification—Class A television stations** are required to maintain documentation in their Public Inspection File sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period April 1, 2024 through June 30, 2024 and upload it to their Public Inspection File.

**Quarterly Fundraising Reports—All noncommercial educational TV and radio stations** that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period April 1, 2024 through June 30, 2024 and upload it to their Public Inspection File by this date.

**Sponsorship Identification Requirements for Foreign Government-Provided Programming— All full-power radio, full-power television, and Class A television stations airing any foreign government-provided programming** during the period April 1, 2024 through June 30, 2024 which required a foreign sponsorship disclosure at the time of broadcast must upload to their Public Inspection File by this date copies of those disclosures and the name of each program in which they were included.

## July 15

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending May 31, 2024 by this date.

## July 31

**Copyright Royalty Claims Due—Television stations** with locally-produced programming whose signals were carried as distant signals by at least one cable or satellite system in 2023 are eligible to file royalty claims for compensation with the Copyright Office in Washington, DC by this date. Under the federal Copyright Act, cable systems and satellite operators must pay “compulsory license” royalties to carry distant TV signals on their systems. The royalties are used to compensate the owners of copyrighted works broadcast on those signals. Stations that do not file claims by this deadline will not be able to collect royalties for distant carriage of their signals during 2023.

## August 1

**Annual EEO Public Inspection File Report Due—Station Employment Units that have five or more full-time employees** and are comprised of **radio and/or television stations** licensed to communities in **California, Illinois, North Carolina, South Carolina, or Wisconsin** must by this date upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period August 1, 2023 through July 31, 2024. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

## August 14

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their

programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending June 30, 2024 by this date.

### September 1

**Regulatory Fees Announced**—The FCC is expected to release a Public Notice this month indicating the date by which annual regulatory fees must be filed and the amounts of those fees. Broadcasters should watch for this announcement.

### September 6

Lowest Unit Charge window opens for the November 5, 2024 general election. See *Item of Note II* above for more details.

### September 14

**Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending July 31, 2024 by this date.

### October 1

**Annual EEO Public Inspection File Report Due—Station Employment Units that have five or more full-time employees** and are comprised of **radio and/or television stations** licensed to communities in **Alaska, American Samoa, Florida, Guam, Hawaii, Iowa, the Mariana Islands, Missouri, Oregon, Puerto Rico, the Virgin Islands, or Washington** must by this date upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period October 1, 2023 through September 30, 2024. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

### October 10

**Quarterly Issues/Programs List Due**—All **full-power radio, full-power television, and Class A television stations** must upload to their Public Inspection File by this date the Quarterly Issues/Programs List covering the period July 1, 2024 through September 30, 2024.

**Class A Television Continuing Eligibility Certification**—**Class A television stations** are required to maintain documentation in their Public Inspection File sufficient to demonstrate continuing compliance with the FCC's Class A eligibility requirements. We recommend that by this date Class A television stations generate such documentation for the period July 1, 2024 through September 30, 2024 and upload it to their Public Inspection File.

**Quarterly Fundraising Reports**—All **noncommercial educational TV and radio stations** that changed or suspended their regular on-air content to conduct third-party fundraising to benefit a non-profit organization must generate relevant documentation for the period July 1, 2024 through September 30, 2024 and upload it to their Public Inspection File by this date.

**Sponsorship Identification Requirements for Foreign Government-Provided Programming**— All **full-power radio, full-power television, and Class A television stations airing any foreign government-provided programming** during the period July 1, 2024 through September 30, 2024 which required a foreign sponsorship disclosure at the time of broadcast must upload to their Public Inspection File by this date copies of those disclosures and the name of each program in which they were included.

**October 15****Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms**

**Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending August 31, 2024 by this date.

**November 14****Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms**

**Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending September 30, 2024 by this date.

**December 1**

**Annual EEO Public Inspection File Report Due—Station Employment Units that have five or more full-time employees** and are comprised of **radio and/or television stations** licensed to communities in **Alabama, Colorado, Connecticut, Georgia, Maine, Massachusetts, Minnesota, Montana, New Hampshire, North Dakota, Rhode Island, South Dakota, or Vermont** must by this date upload to their Public Inspection File and post on their station website a report regarding station compliance with the FCC's EEO Rule during the period December 1, 2023 through November 30, 2024. A more detailed review of station EEO obligations and the steps for implementing an effective EEO program can be found in our [EEO Advisory](#).

**FCC Form 2100, Schedule G, Annual DTV Ancillary/Supplementary Services Report Due—Commercial television, Class A television, and LPTV stations** that provided feeable ancillary or supplementary services during the 12-month period ending on September 30, 2024 must by this date file FCC Form 2100, Schedule G with the FCC. Concurrent with its filing, the station is required to pay to the FCC five percent of the gross revenue derived from such services.

**December 15****Copyright Royalty Fee: Monthly Report of Use and Monthly Usage Statement of Account Forms**

**Due**—Commercial and noncommercial webcasters and those broadcast stations simulcasting their programming over the Internet must file Monthly Report of Use and Monthly Usage Statement of Account forms with SoundExchange for the month ending October 31, 2024 by this date.

**December 31**

**Pillsbury's 2025 Broadcasters' Calendar**—By this date, broadcast stations in all states should ensure they have obtained a copy of Pillsbury's *2025 Broadcasters' Calendar*, and be prepared for another year packed with regulatory deadlines.

For further information about this Advisory, please contact any of the following attorneys in the Communications Practice Group.

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Scott R. Flick **(bio)**

Washington, DC

+1.202.663.8167

[scott.flick@pillsburylaw.com](mailto:scott.flick@pillsburylaw.com)

Lauren Lynch Flick **(bio)**

Washington, DC

+1.202.663.8166

[lauren.lynch.flick@pillsburylaw.com](mailto:lauren.lynch.flick@pillsburylaw.com)

Lee G. Petro **(bio)**

Washington, DC

+1.202.663.8113

[lee.petro@pillsburylaw.com](mailto:lee.petro@pillsburylaw.com)

Jessica T. Nyman **(bio)**

Washington, DC

+1.202.663.8810

[jessica.nyman@pillsburylaw.com](mailto:jessica.nyman@pillsburylaw.com)

Elizabeth E. Craig **(bio)**

Washington, DC

+1.202.663.8117

[elizabeth.craig@pillsburylaw.com](mailto:elizabeth.craig@pillsburylaw.com)

Adam J. Sandler **(bio)**

Washington, DC

+1.202.663.8044

[adam.sandler@pillsburylaw.com](mailto:adam.sandler@pillsburylaw.com)