



It's About That Time Again

The Next Round Of License Renewals Begins In April

How time flies — the license-renewal cycle for radio stations will be underway at this time next year! Licenses for stations in the District of Columbia, Maryland, Virginia, and West Virginia expire on October 1, 2011. That means the first renewal applications will be due June 1, 2011, and licensees in this group must begin airing pre-filing announcements 60 days before that, on April 1, 2011.

Why does this matter to you now? You will be required to certify at renewal time that you complied with FCC requirements over the past license term. So now is the time to identify and correct any shortcomings.

Under the renewal cycle, station groups are scheduled to file renewal applications at two-month intervals through April 1, 2014.

Radio pre-filing announcement start dates for next year:

April 1 District of Columbia, Maryland, Virginia, and West Virginia

June 1 North Carolina and South Carolina

August 1 Florida, Puerto Rico, and the Virgin Islands

October 1 Alabama and Georgia

December 1 Arkansas, Louisiana, and Mississippi

Forewarned is forearmed! Here is a checklist of things to do now to ensure you'll be license-renewal-compliant.

Inventory issues-programs lists. There should be issues-programs lists in the Local Public File for every calendar quarter since the beginning of the current license term. For most stations, this will mean 32 reports over an eight-year term. If any lists are missing, reconstruct them to the extent possible. Prepare a report of your findings and efforts (for your own files, not the Local Public File). If you reconstruct any missing lists, you'll need to explain that at renewal time, and you can expect to be fined.

Review annual EEO Local Public File reports. Stations that employ five or more people full-time must include an annual report of their recruitment activities in the Local Public File, so by renewal time, there should be eight such reports in the file. (The most recent report must also be posted on the station's website.) Confirm that the reports reflect the number of full-time vacancies during the year, identify recruiting sources and referrals, and report on the hires. Note that you have documentation to back up your efforts.

Assess your recruitment outreach. Stations must engage in at least four recruitment outreach activities every two years (stations in smaller markets, or with 10 or fewer full-time employees, must do two activities

every two years). Make sure you will have met the minimum requirements.

Analyze your EEO program. The EEO rule requires stations to conduct a continuing program to exclude all unlawful discrimination in personnel policies, practices, and working conditions, and to conduct a continuing review of job structure and employment practices to ensure genuine equality of opportunity.

Analyze your recruitment program on an ongoing basis to ensure it's achieving broad outreach, including measures to disseminate the station's EEO program, review seniority practices, examine pay rates and fringe benefits, use media neutrally, and ensure there is no discrimination in promotions.

Write up your analysis in a report and place it in your business files — **not** the Local Public File.

Survey the Local Public File. As a thumbnail review, make sure the file has:

The FCC's manual on "The Public and Broadcasting"

A copy of the current station license
Copies of any pending applications

A station contour map, the main studio address, and the transmitter address

The most recent ownership report and contracts (such as articles, by-laws, LMAs)

Issues-programs lists (all since last renewal)

Political file (two years)

Annual EEO reports (all since last renewal)

For commercial stations, letters/e-mails from the public (three years)

For noncommercial stations, donor lists (two years)

Compliance translates to the bottom line: Recordkeeping failures can cost a station thousands of dollars in FCC fines. And the FCC staff has made it clear that, like the cost of living, there will be increases in its forfeiture "rate card" and fines will be even more stiff in the coming renewal cycle.

Don't wait to get started — check the chart below, circle your dates, and begin now to implement your renewal cycle compliance plan. **INK**

RADIO LICENSE RENEWAL SCHEDULE

State	File	Expire
AK	Oct 13	Feb 14
AL	Dec 11	April 12
AR	Feb 12	June 12
AS	Oct 13	Feb 14
AZ	June 13	Oct 13
CA	Aug 13	Dec 13
CO	Dec 12	Apr 13
CT	Dec 13	Apr 14
DC	June 11	Oct 11
DE	Apr 14	Aug 14
FL	Oct 11	Feb 12
GA	Dec 11	Apr 12
GU	Oct 13	Feb 14
HI	Oct 13	Feb 14
IA	Oct 12	Feb 13
ID	Jun 13	Oct 13
IL	Aug 12	Dec 12
IN	Apr 12	Aug 12
KS	Feb 13	Jun 13
KY	April 12	Aug 12
LA	Feb 12	June 12
MA	Dec 13	Apr 14
MD	June 11	Oct 11
ME	Dec 13	April 14
MI	June 12	Oct 12
MN	Dec 12	April 13
MO	Oct 12	Feb 13
MP	Oct 13	Feb 14
MS	Feb 12	June 12
MT	Dec 12	April 13
NC	Aug 11	Dec 11
ND	Dec 12	April 13
NE	Feb 13	June 13
NH	Dec 13	Apr 14
NJ	Feb 14	June 14
NM	June 13	Oct 13
NV	June 13	Oct 13
NY	Feb 14	June 14
OH	June 12	Oct 12
OK	Feb 13	June 13
OR	Oct 13	Feb 14
PA	April 14	Aug 14
PR	Oct 11	Feb 12
RI	Dec 13	April 14
SC	Aug 11	Dec 11
SD	Dec 12	April 13
TN	April 12	Aug 12
TX	April 13	Aug 13
UT	June 13	Oct 13
VA	June 11	Oct 11
VI	Oct 11	Feb 12
VT	Dec 13	April 14
WA	Oct 13	Feb 14
WI	Aug 12	Dec 12
WV	June 11	Oct 11
WY	June 13	Oct 13