

# Advisory



Communications

December 2025

## 2026 Broadcasters' Calendar

### January 1

**Audio Description Requirements Extend to Nielsen Designated Market Areas 111 to 120—** Commercial television stations affiliated with one of the top four broadcast networks and assigned to **Tyler-Longview (Lufkin & Nacogdoches), Sioux Falls (Mitchell), Fargo, Springfield-Holyoke, Lansing, Youngstown, Yakima-Pasco-Richland-Kennewick, Traverse City-Cadillac, Eugene, and Macon** Nielsen Designated Market Areas must comply with the FCC's audio description (formerly called video description) rules beginning on 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, 2025 through December 31, 2025.

**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, 2025 through December 31, 2025 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, 2025 through December 31, 2025 and upload it to their Public Inspection File by this date. See [47 CFR § 73.3527\(e\)\(14\)](#).

**Sponsorship Identification Requirements for Foreign Government-Provided Programming—All licensees airing any foreign programming** which requires a specific disclosure at the time of broadcast during the period October 1, 2025 through December 31, 2025 must place a copy of the disclosure and the name of the program to which the disclosure was appended, as well as the dates and times the program aired, in their Public Inspection File by this date. See [47 CFR Section 73.1212\(j\)](#). Note that the FCC expanded the breadth of content to which this rule applies and the underlying paperwork requirements on

June 10, 2025, but has twice deferred the deadline for complying with these expanded requirements. The latest extension moved that compliance date to June 7, 2026.

### 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 streaming 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, 2025 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 2025.

**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 2025.

### 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, 2025 through January 31, 2026. 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 2

**Copyright Royalty Fee: Annual Minimum Fee Statement of Account Form Due**—By this date, most commercial and noncommercial webcasters and those broadcast stations streaming their programming over the Internet must submit the **Minimum Fee Statement of Account Form** and the annual copyright royalty fee to SoundExchange. February 2 is also the date by which certain noncommercial educational webcasters, such as student-run noncommercial educational stations streaming 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 programming is streamed over the Internet, we encourage you to consult qualified counsel with regard to your obligations.

### 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 streaming 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, 2025 by this date.

### March 17

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

**Due**—Commercial and noncommercial webcasters and those broadcast stations streaming 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, 2026 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, 2025 through March 31, 2026. 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, 2026 through March 31, 2026.

**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, 2026 through March 31, 2026 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, 2026 through March 31, 2026 and upload it to their Public Inspection File by this date. See [47 CFR § 73.3527\(e\)\(14\)](#).

**Sponsorship Identification Requirements for Foreign Government-Provided Programming—All licensees airing any foreign programming** which requires a specific disclosure at the time of broadcast during the period January 1, 2026 through March 31, 2026 must place a copy of the disclosure and the name of the program to which the disclosure was appended, as well as the dates and times the program aired, in their Public Inspection File by this date. See [47 CFR Section 73.1212\(j\)](#). Note that the FCC expanded the breadth of content to which this rule applies and the underlying paperwork requirements on June 10, 2025, but has twice deferred the deadline for complying with these expanded requirements. The latest extension moved that compliance date to June 7, 2026.

### 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 streaming 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 28, 2026 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 2025 EEO-1 Component 1 data collection at the time of publication of this Calendar, filers should expect that window to open in **April 2026**. 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 2025. We encourage you to consult with counsel on the filing and visit <https://www.eeoc.gov/employers/eeo-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 streaming 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, 2026 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, 2025 through May 31, 2026. 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 streaming 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, 2026 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, 2026 through June 30, 2026.

**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, 2026 through June 30, 2026 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, 2026 through June 30, 2026 and upload it to their Public Inspection File by this date. See [47 CFR § 73.3527\(e\)\(14\)](#).

**Sponsorship Identification Requirements for Foreign Government-Provided Programming—All licensees airing any foreign programming** which requires a specific disclosure at the time of broadcast during the period April 1, 2026 through June 30, 2026 must place a copy of the disclosure and the name of the program to which the disclosure was appended, as well as the dates and times the program aired, in their Public Inspection File by this date. See [47 CFR Section 73.1212\(j\)](#). Note that the FCC expanded the breadth of content to which this rule applies and the underlying paperwork requirements on June 10, 2025, but has twice deferred the deadline for complying with these expanded requirements. The latest extension moved that compliance date to June 7, 2026.

**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 streaming 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, 2026 by this date.

**July 31**

**Copyright Royalty Claims Due<sup>1</sup>—Television stations** with locally-produced programming whose signals were carried as distant signals by at least one cable or satellite system in 2025 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 the deadline will not be able to collect royalties for distant carriage of their signals during 2025.

**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, 2025 through July 31, 2026. 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 streaming 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, 2026 by this date.

**September 4**

Lowest Unit Charge window opens for the November 3, 2026 federal election.

**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 streaming 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, 2026 by this date.

**October 1**

**Broadcast Television Carriage Election**—All commercial full-power television and qualifying Class A television stations must by this date elect retransmission consent or must-carry status for the January 1, 2027 to December 31, 2029 period. Such stations must upload to the “Must-Carry or Retransmission Consent” folder of their Public Inspection File a statement noting their election(s) and retain that documentation in their Public Inspection File for the duration of the three-year period. A station changing

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<sup>1</sup> Though July 31 is the historical deadline for this obligation, the 2026 deadline has not been announced as of the date of publication of this Calendar and stations should confirm the deadline prior to this date.

its election from what it elected for the preceding three-year period must also notify the relevant cable and satellite providers by email (with a copy sent to [ElectionNotices@fcc.gov](mailto:ElectionNotices@fcc.gov)), and upload copies of these notices to its Public Inspection File. Noncommercial television stations requesting mandatory carriage must place in their Public Inspection File a copy of that request if they had not already done so for a previous election cycle (as the earlier election remains in effect). Qualifying LPTV stations, which are not required to maintain a Public Inspection File, should have notified cable and satellite providers of their election by email in 2023, and must by this date notify cable and satellite providers by email only if they are changing their election for the upcoming three-year period. A copy of such emails must also be sent to [ElectionNotices@fcc.gov](mailto:ElectionNotices@fcc.gov).

**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, 2025 through September 30, 2026. 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, 2026 through September 30, 2026.

**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, 2026 through September 30, 2026 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, 2026 through September 30, 2026 and upload it to their Public Inspection File by this date. See [47 CFR § 73.3527\(e\)\(14\)](#).

**Sponsorship Identification Requirements for Foreign Government-Provided Programming—All licensees airing any foreign programming** which requires a specific disclosure at the time of broadcast during the period July 1, 2026 through September 30, 2026 must place a copy of the disclosure and the name of the program to which the disclosure was appended, as well as the dates and times the program aired, in their Public Inspection File by this date. See [47 CFR Section 73.1212\(j\)](#). Note that the FCC expanded the breadth of content to which this rule applies and the underlying paperwork requirements on June 10, 2025, but has twice deferred the deadline for complying with these expanded requirements. The latest extension moved that compliance date to June 7, 2026.

## 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 streaming 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, 2026 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 streaming 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, 2026 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, 2025 through November 30, 2026. 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, 2026 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 streaming 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, 2026 by this date.

**December 31**

**Pillsbury's 2027 Broadcasters' Calendar**—By this date, broadcast stations in all states should ensure they have obtained a copy of *Pillsbury's 2027 Broadcasters' Calendar*, and be prepared for another year packed with regulatory deadlines.

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

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