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## MEMORANDUM

TO: Broadcast Clients in AK, FL, HI, IA, MO, PR, OR, WA

FROM: Barry S. Persh

DATE: September 13, 2017

RE: FCC Deadline of October 1, 2017 for Annual EEO Public File Report

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Please note that **October 1, 2017** is the FCC deadline for many broadcast stations in Alaska, Florida, Hawaii, Iowa, Missouri, Puerto Rico, Oregon, and Washington state to complete and post the annual EEO public file report.

This year's EEO report will cover the one-year period from October 1, 2016 through September 30, 2017. Note, however, that station employment units (which are organized by market locations if you have multiple stations) with fewer than five full-time employees are **not** required to complete the annual EEO public file report. If applicable, the annual EEO report must be placed in your public inspection file and posted on your station's web site by October 1<sup>st</sup>. For TV stations, your public file report posting must occur in your online public file hosted through the FCC web site. Radio stations will continue to add the report to the public file maintained at their main studio location (unless they have already completed an early transition to the online public file).

Notably, stations are also required to submit copies of recent annual EEO reports to the FCC when it is time to file license renewal applications and mid-term EEO reports, or if they are subject to a random FCC EEO audit. In connection with audits and mid-term filings, the FCC may closely review these reports and web site postings to confirm compliance.

The EEO public file report is among the requirements of the FCC's current EEO rules for broadcasters, which have been in effect since 2003. If you need copies of our memoranda which discuss in detail the FCC's EEO regulations requirements and the annual EEO public file report (and which include sample reports), please let us know. In short, the EEO public file report must include: (1) a list of all full-time jobs filled by the station's employment unit during the previous year, identified by job title; (2) for each such vacancy, the recruitment sources used to fill those vacancies, identified by name, address, contact person and phone number; (3) for each full-time vacancy during the preceding year, the recruitment source for the person hired; (4) data reflecting the total number of persons interviewed for full-time vacancies during the preceding year and, for each vacancy, the number of interviewees referred by each recruitment source; and (5) a list and brief description of Long-Term (or "Prong 3") non-vacancy-specific recruitment initiatives implemented during the previous year. If no vacancies have been filled during the last year, then the report should so state.

*Please feel free to contact our office for assistance with preparing or reviewing these reports, or with any questions.*