

Client Update

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FCC REQUIRES TV STATIONS TO USE ONLINE PUBLIC INSPECTION FILE

Yesterday, the Federal Communications Commission (FCC) published a [final rule](#) in the Federal Register which revises the FCC's public inspection file regulations to require that television station public inspection files be made available in an online public file to be hosted on the FCC's website.

The FCC final rule attempts to modernize the procedures television broadcasters use to inform the public by having stations post their public files online in a central FCC-hosted database, rather than maintaining the public inspection files at the station's main studio. The FCC's stated purpose for this rule is to make information concerning broadcast service more accessible to the public. In addition, the FCC suggests that the rule will reduce the broadcasters' cost of compliance over time. The FCC is not imposing any new reporting requirements, but rather seeking to eliminate paper files.

The FCC's final rule requires that stations place their new public inspection file documents on the FCC-hosted online website. Stations will be responsible for placing existing public file documents into the FCC's-hosted online public inspection file.

However, the FCC will phase in the new posting requirements over the next two years to require only stations affiliated with the top four national networks (ABC, NBC, CBS, and Fox) and that are licensed to service communities in the top 50 Designated Market Areas (DMA) to post political file documents online. The FCC will exempt all other stations from posting their political file documents to their online public inspection file until July 1, 2014.

This final rule will not be effective until approved by the Office of Management and Budget (OMB). **The requirements in this rule will become effective 30 days after the FCC publishes a notice in the Federal Register** announcing OMB approval of these requirements.

We will continue to monitor rulemaking activity with regard to FCC public inspection file requirements. Please contact our office with questions regarding the FCC final rule.

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