
UPDATE January 25, 2022

Media Bureau CDBS Filing Database Sunsets

Earlier this month, the FCC's Media Bureau released a [Public Notice](#) announcing that the Consolidated Database System ("CDBS") – which is used by MVPDs for annual EEO Form 396-C filings, shut down on Wednesday, January 12, 2022.

The Media Bureau took this step as part of the ongoing transition of all filings to the Licensing and Management System ("LMS") database. Most filings have been transitioned to the LMS database. However, some – including Form 396-C – are not yet supported by LMS.

Anyone seeking to submit new filings using CDBS or amendments to existing applications that were previously filed using CDBS that cannot be submitted using LMS must be submitted by email to audiofilings@fcc.gov. In the case of filings using an FCC form, the form should be submitted as an attachment to the email in "pdf" format. Informal filings (such as requests for Special Temporary Authority) submitted by letter may be submitted in "pdf" or "Word" format. The "Subject" of the email should include the nature of the submission, the call sign and facility ID of the station (if any) and any relevant docket number or file number.

The public will continue to have access to CDBS for public searches and CDBS data files. If you have any questions regarding EEO Form 396-C, the FCC's EEO rules or electronic filings, please contact Scott Friedman at (314) 462-9000 or sfriedman@cinnamonmueller.com.

FCC Form 477 Due March 1, 2022

Operators Must Now Use 2020 Census Data

The next Form 477 is due **March 1, 2022**. Telephone, broadband, and interconnected VoIP providers must report information about broadband connections and local telephone service as of December 31, 2021.

Importantly, all filers must now use 2020 census geography codes when creating and filing data as of December 31, 2021. To ease revisions, filings of data as of June 30, 2021 (which were due September 1, 2021) will continue to rely on 2010 census codes. Also, filers must now use their CORES username and password to log in to the Form 477 filing interface. For info on getting a CORES username and password, click [here](#) and for a preview of the new login procedure, click [here](#).

Instructions for filers can be found [here](#). The FCC's Office of Economics and Analytics has reminded service providers that failure to file Form 477 may subject them to enforcement action under section 502 and 503 of the Communications Act and any other applicable law.

If you have any questions about Form 477, please contact Scott Friedman at (314) 462-9000 or sfriedman@cinnamonmueller.com.

Copyright Forms and Fees Due by March 1, 2022

Cable operators must file with the U.S. Copyright Office their Statement of Accounts (Form SA1-2 or SA3) and pay any royalty fees due for the July 2020 – December 2021 accounting period by **March 1, 2022**. The following forms apply:

- **SA1-2 Short Form.** For use by cable systems with semiannual gross receipts of less than \$527,600.
- **SA3 Long Form.** For use by cable systems with semiannual gross receipts of \$527,600 or more.

Cable operators may now electronically sign and submit their SOAs. Excel-based SA1-2E Short Form and SA3E Long Form, along with additional instructions regarding the forms, are available for download on the Copyright Office's [Section 111 webpage](#). Cable operators may choose to continue to use the paper-based forms as well.

Copyright filings must be accompanied by a filing fee in addition to the royalty payment. The filing fee is calculated based on the type of form filed:

| SOA Type | Filing Fee |
|---|------------|
| SA-1 (\$137,100 or less gross revenues) | \$15 |
| SA-2 (\$137,101 – \$527,599 gross revenues) | \$20 |
| SA-3 (\$527,600 or more gross revenues) | \$725 |

Operators must also remit the royalty fee and filing fee in a single electronic payment. If you have any questions about copyright forms or fees, please contact Bruce Beard at (314) 394-1535 or bbeard@cinnamonmueller.com.

Please visit our website at www.cinnamonmueller.com to learn more about our lawyers and practice. You can reach Cinnamon Mueller at (314) 462-9000. *This update is provided by the law firm of Cinnamon Mueller. The document is intended for informational purposes only as a service to clients of Cinnamon Mueller. It is not intended to provide specific legal advice or to substitute obtaining appropriate legal counsel. We encourage you to consult with counsel to address special compliance issues and for assistance in negotiating or handling any such matter referred to in the update.*