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**UPDATE**  
**February 4, 2020**

**Copyright Forms and Fees Due by March 2, 2020**

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 2019 – December 2019 accounting period by **March 2, 2020**. 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:

<b>SOA Type</b>	<b>Filing Fee</b>
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](mailto:bbeard@cinnamonmueller.com).

**FCC Form 477 Due March 2, 2020**

The next Form 477 is due **March 2, 2020**. Telephone, broadband, and interconnected VoIP providers must report information about broadband connections and local telephone service as of December 31, 2019.

Instructions for filers can be found [here](#). Filers can also review a brief summary of the Form 477 changes made in 2014 on the FCC's [website](#). 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](mailto:sfriedman@cinnamonmueller.com).

## **New Leased Access Contact Information Requirement Now in Effect**

Last June, the FCC released a [Report and Order](#) modernizing its leased access rules. In short, the Order eliminated part-time leased access, extended timeframes to respond to requests, and removed obligations to respond to requests that are not bona fide. At the same time, however, the FCC required cable operators to provide potential leased access programmers with contact information for the person responsible for leased access matters.

As of December 2019, this new contact information requirement is now in effect.

Under this new leased access contact information requirement, cable operators must place certain basic contact information on on their own websites, or through alternate means if they do not have their own websites. This includes the name or title, telephone number, and email address for the person responsible for responding to requests for information about leased access channels. Further, although the information does not need to be on an operator's main webpage, the contact information must be reasonably identifiable.

Commercial leased access requirements date back to the 1984 Cable Act, which sought to assure access to cable systems by unaffiliated third parties that want to distribute video programming free of the cable operator's editorial control. Accordingly, under the Cable Act and FCC regulations, leased access programmers can obtain valuable and scarce capacity on cable systems. If you have any questions about leased access programming or the new contact information requirement, please contact Bruce Beard at (314) 394-1535 or [bbeard@cinnamonmueller.com](mailto:bbeard@cinnamonmueller.com).

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**Please visit our website at [www.cinnamonmueller.com](http://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.***