

UPDATE July 9, 2019

August 7, 2019 EAS National Test Date Approaching

Last month, the FCC's Public Safety and Homeland Security Bureau released a [Public Notice](#) announcing that FEMA, in collaboration with the FCC, will conduct an Emergency Alert System ("EAS") test on August 7, 2019 at 2:20 pm EDT with a backup date of August 21, 2019. EAS Participants, which include cable operators, were required to renew their identifying information in ETRS Form One by July 3, 2019.

All EAS Participants must file "day of test" information sought by ETRS Form Two on the EAS test date, August 7, 2019 and must file ETRS Form Three on or before September 23, 2019.

Unlike in recent years, the 2019 nationwide test will only be disseminated using a hierarchical, broadcast-based distribution system, otherwise known as the "daisy chain" and not over the Internet using the Integrated Public Alert and Warning System ("IPAWS"). Because the test will be disseminated in this manner, FEMA has indicated that "full message text and multilingual messaging will not be available." Nonetheless, the Public Notice reminds EAS Participants that the alerts must comply with the FCC's accessibility requirements and, as such, will include both audio and visual elements as required by the FCC's rules.

If you have questions about EAS or about preparing your cable system for the upcoming nationwide EAS test, please contact Scott Friedman at (314) 462-9000 or sfriedman@cinnamonmueller.com.

Copyright Forms and Fees Due by August 29, 2019

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 January 2019 – June 2019 accounting period by August 29, 2019. 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.

FCC Form 477 Due September 3, 2019

The next Form 477 is due September 3, 2019. Telephone, broadband, and interconnected VoIP providers must report information about broadband connections and local telephone service as of June 30, 2019.

Note: Form 477 is due annually on September 1st. This year, however, September 1st falls on a Sunday and Monday, September 2nd, is the Labor Day holiday.

As a reminder, Form 477 must be filed online through the [FCC's filing interface](#). 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](#).

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

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