

UPDATE September 4, 2019

FCC Regulatory Fee Payments Due by 11:59 PM EDT on September 24, 2019

On August 27, 2019, the FCC released an [Order](#) establishing its Fiscal Year 2019 regulatory fees, and [announced](#) that regulatory fee payments must be made no later than 11:59 p.m. EDT on September 24, 2019.

All licensees must use the [Fee Filer System](#), and review, create, update, or change the fees owed. Then, each licensee must choose a payment method – online payment with a credit or debit card, online payment from a bank account, or sending a wire transfer.

Fee amounts. The FCC has set the following regulatory fees:

- **2019 Cable/IPTV regulatory fee:** Cable systems (including IPTV systems) that had subscribers as of December 31, 2018 must pay \$0.86 per subscriber, a \$0.09 increase from 2018.
- **CARS licenses and permits:** CARS facilities operating on October 1, 2018 must pay \$1,225, a \$150 increase from 2018, even if the facility's license expired after October 1, 2018.
- **Interconnected VoIP regulatory fee:** \$0.00317 for each dollar of interstate and international telecommunications revenue that a provider reports on its Form 499-A.

De minimis exemption. Entities whose total regulatory fee liability, including all categories of fees for which payment is due, is \$1,000 or less are exempt from payment. Municipal providers and providers that qualify as non-profit entities are also exempt from regulatory fees.

If you have any questions about the payment of FY 2019 regulatory fees, please contact Scott Friedman at (314) 462-9000 or sfriedman@cinnamonmueller.com.

EAS Form Three Due September 23, 2019

Last month, on Wednesday, August 7, 2019, FEMA conducted a [nationwide test](#) of the Emergency Alert System (“EAS”). All EAS Participants, including multichannel video programming distributors (“MVPDs”) were required to receive and broadcast the test message in an accessible format.

In conjunction with the National Test, **EAS Participants must file ETRS Form Three on or before September 23, 2019.**

If you have questions about EAS or about preparing for the upcoming nationwide EAS test, please contact Scott Friedman at (314) 462-9000 or sfriedman@cinnamonmueller.com or Bruce Beard at (314) 394-1535 or bbeard@cinnamonmueller.com.

EEO Form 396-C Due September 30, 2019

On August 5, 2019, the FCC's Enforcement Bureau released a [Public Notice](#) announcing that multichannel video programming distributors ("MVPDs"), including cable operators, must submit Form 396-C, the FCC's MVPD Equal Employment Opportunity ("EEO") Program Annual Report, electronically by midnight on **September 30, 2019**. To file Form 396-C, login to the Media Bureau's [CDBS Electronic Filing System](#).

MVPDs that have been randomly selected to file a Supplemental Investigation Sheet ("SIS") along with their Form 396-C must complete the following:

- Include one job description for employees in the "Service Workers" category in Part I of the form.
- Answer questions 4, 5 and 8 in Part II of the form:
 - Explain the employment unit's efforts to promote in a nondiscriminatory manner to positions of greater responsibility.
 - Describe the employment unit's efforts to encourage entrepreneurs to conduct business in a nondiscriminatory manner with all parts of its operation and provide an analysis of the results of those efforts.
 - Describe the manner in which the employment unit conducts its continuing review of job structure and employment practices.
- Attach, as Part III, a copy of the unit's EEO public file report created in 2019 covering the previous 12 months.

If you have any questions about EEO compliance, please contact Scott Friedman at (314) 462-9000 or sfriedman@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.*