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**UPDATE  
September 22, 2020**

**EEO Form 396-C Due September 30, 2020**

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 were listed in the Enforcement Bureau’s [Public Notice](#) and must complete the following:

- Include one job description for employees in the “Office and Clerical” category in Part I of the form.
- Answer questions 1, 3 and 7 in Part II of the form:
  - Describe the employment unit’s efforts to comply with the FCC’s EEO outreach provisions.
  - Name the organizations, media, educational institutions, and other recruitment sources used to attract applicants whenever job vacancies become available.
  - Describe the responsibility of each level of the employment unit’s management with respect to application and enforcement of its EEO policy and explain the procedure for review and control of managerial and supervisory performance.
- Attach, as Part III, a copy of the unit’s EEO public file report created in 2020 covering the previous 12 months.

MVPDs should recall that earlier this year, the FCC’s Media Bureau released an [Order](#) waiving the broad outreach requirements of the FCC’s EEO recruitment rules to allow affected broadcast licensees and MVPDs to return operations to full strength once circumstances permit the re-hiring of released employees. Accordingly, MVPDs may rehire full-time employees who were laid off due to circumstances related to the ongoing COVID-19 pandemic without first conducting broad recruitment outreach.

This waiver is conditioned on the MVPD rehiring such employees within nine months after the date they were laid off. To the extent an MVPD takes advantage of this partial waiver, this should be reflected on the public file report.

If you have any questions about EEO compliance, please contact Scott Friedman at (312) 372-3930 or [sfriedman@cinnamonmueller.com](mailto:sfriedman@cinnamonmueller.com).

## **FCC Regulatory Fee Payments Due by 11:59 PM EDT on September 25, 2020**

On August 31, 2020, the FCC released an [Order](#) establishing its Fiscal Year 2020 regulatory fees, and [announced](#) that regulatory fee payments must be made no later than 11:59 p.m., EDT, on September 25, 2020.

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.

Due to the COVID-19 pandemic, the FCC has streamlined its procedures for requests for relief due to financial hardship. However, the standard an applicant must meet to obtain a waiver remains the same.

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

- **2020 Cable/IPTV regulatory fee:** Cable systems (including IPTV systems) that had subscribers as of December 31, 2019 must pay \$0.89 per subscriber, a \$0.03 increase from 2019.
- **CARS licenses and permits:** CARS facilities operating on October 1, 2019 must pay \$1,300, a \$75 increase from 2019, even if the facility's license expired after October 1, 2019.
- **Interconnected VoIP regulatory fee:** \$0.00321 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 2020 regulatory fees, please contact Scott Friedman at (314) 462-9000 or [sfriedman@cinnamonmueller.com](mailto:sfriedman@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.***