

UPDATE

September 9, 2021

Form 477 Now Due September 15, 2021, for Most Providers

Deadline is October 1st for Affected Providers in Louisiana and Mississippi

Recently, the FCC's Office of Economics and Analytics released a [Public Notice](#) establishing October 1, 2021 as the new deadline for submission of Form 477 for providers in Louisiana and Mississippi that were affected by Hurricane Ida. For all other filers, the deadline is September 15, 2021. As a reminder, telephone, broadband, and interconnected VoIP providers must report information about broadband connections and local telephone service as of June 30, 2021.

Instructions for filers can be found [here](#). Filers can also review a brief summary of the Form 477 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.

FCC Regulatory Fee Payments Due by 11:59 PM EDT on September 24, 2021

On August 25, 2021, the FCC released an [Order](#) establishing its Fiscal Year 2021 regulatory fees, and [announced](#) that regulatory fee payments must be made no later than 11:59 p.m., EDT, on September 24, 2021.

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:

- **2021 Cable/IPTV/DBS regulatory fee:** All MVPDs, including cable systems, IPTV systems and DBS operators that had subscribers as of December 31, 2020, must pay \$0.98 per subscriber, a \$0.09 increase from 2020.
- **CARS licenses and permits:** CARS facilities operating on October 1, 2020, must pay \$1,555, a \$255 increase from 2020, even if the facility's license expired after October 1, 2020.
- **Interconnected VoIP regulatory fee:** \$0.00400 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 2021 regulatory fees, please contact Scott Friedman at (314) 462-9000 or sfriedman@cinnamonmueller.com.

FCC EEO Form 396-C Due September 30, 2021

On July 1, 2021, 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, 2021**. 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 "Officials and Manager" category in Part I of the form.
- Answer questions 2, 4 and 6 in Part II of the form:
 - Describe the employment unit's efforts to disseminate widely its EEO program to job applicants, employees, and those with whom it regularly does business.
 - Explain the employment unit's efforts to promote in a nondiscriminatory manner to positions of greater responsibility.
 - Report the findings of the employment unit's analysis of its efforts to recruit, hire, promote in a nondiscriminatory manner and explain any difficulties encountered in implementing its EEO program.
- Attach, as Part III, a copy of the unit's EEO public file report created in 2021 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.*