

UPDATE
July 28, 2025

FCC Selects MVPDs for Supplemental EEO Filings

EEO Form 396-C Due September 30, 2025

Earlier this month, the FCC's Enforcement Bureau released a [Public Notice](#) reminding multichannel video programming distributors ("MVPDs"), including cable operators, that they must submit Form 396-C, the FCC's MVPD Equal Employment Opportunity ("EEO") Program Annual Report, by midnight on September 30, 2025. To file Form 396-C, login to the Media Bureau's COALS Electronic Filing System via <https://fccprod.servicenowservices.com/coals>.

With the Public Notice, the Enforcement Bureau also identified the MVPDs that have been randomly selected to file a Supplemental Investigation Sheet ("SIS") along with their Form 396-C. MVPDs selected to file an SIS must complete the following:

- Include one job description for employees in the "Professionals" category in Part I of the form.
- Answer questions 3, 5 and 8 in Part II of the form:
 - Name the organizations, media, educational institutions, and other recruitment sources used to attract applicants whenever job vacancies become available.
 - 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 2025 covering the previous 12 months.

Form 396-C is submitted on an employment unit basis. Employment units with six or more full-time employees must submit Form 396-C annually. Employment units with less than six full-time employees have more limited filing obligations.

This public notice is an important reminder that in addition to Form 396-C, **MVPDs must place a copy of each EEO 396-C (or a link to the electronic filing) on their website and must also comply with certain EEO public inspection file requirements.**

If you have any questions about EEO compliance, please contact Scott Friedman at (314) 462-9000 ext. 3 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.*