**June 2022** 

# Regulatory Fees Proposed for Fiscal Year 2022

In a *Notice of Proposed Rulemaking* in Docket 22-223 (FCC 22-39), the FCC has announced the regulatory fees that it proposes to collect for fiscal year 2022—the 12-month period ending September 30, 2022. Congress has mandated the collection of these fees to offset the cost of operating the Commission. The total amount to be collected this year is a little under \$382 million, about two percent more than the total that was assessed for fiscal year 2021.

The Commission calculates the amount of the fee to be paid by each regulated entity by estimating the cost in personnel time spent on servicing and regulating that entity. Staff time is measured in "full time equivalents" (or "FTEs") and allocated among the agency's four core bureaus (Media, International, Wireless Telecommunications, and Wireline Competition) as direct FTEs. For this fiscal year, there are 329 direct FTEs in the Commission among these four bureaus. According to the FCC, the percentage of the total direct FTEs assigned to each bureau was found to be 36.47 percent for Media, 8.51 percent for International, 21.28

continued on page 3

# Computer Modeling Approved for FM Applications

With the adoption of a *Report and Order* in Docket 21-422 (FCC 22-38), the FCC has amended its Rules to permit the use of computer modeling to demonstrate that an antenna proposed to produce a directional coverage pattern will perform as proposed.

An FM permittee holding a construction permit that authorizes a directional antenna must include with its license application a plot of the composite pattern of the directional antenna, and a tabulation of the measured relative field pattern. Until now these data had to be obtained either by building a full-size mockup of the antenna and supporting structures or by constructing a scale model of the antenna and structures on a test range or in an anechoic chamber.

The FCC initiated this proceeding when a group of

continued on page 2

# Write-In Candidate Denied "Legally Qualified" Status

The FCC's Media Bureau has denied a complaint by a Congressional write-in candidate against two radio stations for allegedly violating the political broadcasting rules. Jim Condit, Jr. filed a complaint against Citicasters Licenses, Inc., licensee of WKRC(AM) and WLW(AM), Cincinnati, Ohio. He had sought to purchase airtime with the advantages accorded to a legally qualified candidate for federal elective office. The stations ultimately refused his request. In a *Memorandum Opinion and Order* (DA 22-395), the Media Bureau ruled that the stations were justified in declining to broadcast Condit's political ads because he had failed to make a substantial showing that he was a bona fide write-in candidate, as defined in Section 73.1940(f) of the FCC's Rules.

Condit expected that the stations would sell him airtime with the deference broadcasters must give legally qualified candidates. Section 315(a) of the Communications

continued on page 6

#### IN THIS ISSUE

Franken FMs	2
Content Vendor Diversity	3
LMS Transition	3
Call Signs Move to LMS	3
Deadlines to Watch	. 4-6

For more information about or help with any of the items reported in **Antenna™** please contact:



1200 Seventeenth St. NW Washington, D.C. 20036

Tel: 202.663.8167
Fax: 202.663.8007

E-mail: scott.flick@pillsburylaw.com

### FCC Considers Franken FMs and Adjacent FM Service

The FCC has adopted and released a *Fifth Notice of Proposed Rulemaking* in Docket 03-185 (FCC 22-40) to further its review and consideration of the transmissions of analog FM audio streams on digital low power television stations operating on Channel 6 (FM6 operations). This audio transmission occurs on 87 MHz, and can be received by most FM receivers

When Channel 6 television stations operated in analog mode, the audio portion of the television signal was readily available to FM listeners. A number of LPTV operators developed FM-like radio services, so-called Franken FM stations.

The transition to digital television broadcasting put these FM6 operations at risk, because the digital television signal is not compatible with analog FM receivers. To address this problem, one LPTV operator asked the FCC to grant a special temporary authorization to operate its LPTV station in ATSC 3.0 mode, with a separate analog FM transmitter on 87.7 MHz to serve as an auxiliary service to the station's digital ATSC 3.0 operation. The operator asserted that this arrangement would enable it to continue to serve the niche audience that had grown accustomed to the former analog service.

The Media Bureau granted this STA request with restrictions. The LPTV station was required to convert to ATSC 3.0 and FM transmissions were restricted to 87.75 MHz. No interference could be caused to any other licensed user of spectrum and the station's audio and video service areas must be approximately the same.

That was followed by other similar requests that were granted. The Commission says there are now 13 such

temporary FM6 operations around the country. The STAs for these services are valid for only six months before an extension of authority must be requested.

The Commission now invites public input on whether these FM6 operations should continue with permanent authorizations, and, if so, under what conditions. Under the current proposal, the Commission will not authorize additional LPTV stations to provide this hybrid service.

After many years of regulatory limbo for Franken FMs, the FCC is trying to develop a final resolution to the FM6 issue. The agency seeks comment on the following questions:

- Do FM6 operations serve the public interest, and should they be authorized to continue in any capacity?
- Should existing FM6 operations be authorized as ancillary or supplementary services and, if so, be subject to technical rules similar to the engineering restrictions in the existing FM6 STAs?
- Should the FCC limit further FM6 operations to only those LPTV channel 6 stations with active FM6 engineering STAs as of the release date of this *Notice of Proposed Rulemaking?*
- Should the spectrum in the 82-88 MHz band be opened to use by noncommercial FM stations in areas where there is no Channel 6 television station?
- Should the FCC eliminate or revise the television Channel 6 distance separation rules for full power noncommercial FM, LPFM, Class D, and FM translator stations in the reserved FM band?

Comments are due by July 18. Reply Comments are due by August 1.

#### Computer Modeling Approved for FM Applications continued from page 1

antenna manufacturers and a broadcaster petitioned the FCC to allow FM license applicants to use a less costly method of demonstrating that a directional FM antenna will provide the coverage authorized in its construction permit. The petitioners explained that, in addition to being expensive, the physical measurements are time-consuming and vulnerable to problems arising from the difficulty of replicating the environment where the antenna is to be installed. The petitioners asserted that a properly implemented computer model could take these factors into account and produce a more accurate and less expensive pattern verification.

FM license applicants covering a directional construction permit will now have the option (but not the requirement) to employ computerized models to demonstrate an antenna's performance. This flexibility comes with the restriction that the computer model must be developed by the antenna's manufacturer. The Commission reasons that the manufacturer knows its antenna better than anyone else, and therefore would be the best source of the necessary software. This naturally follows from the current practice where physical

testing is conducted by the manufacturer prior to delivery of the antenna to the station.

The Commission will now also permit unrelated license applicants to rely on the same computer software to support their applications, if they are using the same model of antenna. When a particular antenna model or series of elements has been verified by any license applicant using a particular modeling software, the Commission will allow all subsequent license applicants using the same antenna model number or elements and using the same modeling software to submit the computer model for the subsequent antenna installation, with a cross-reference to the file number for the application that first used it.

New rules and rule amendments generally become effective 30 days after publication in the Federal Register. However, changes adopted in this order contain new or modified information collection requirements that must be reviewed by the Office of Management and Budget before they can become effective. When that review has been successfully completed, the effective date will be published in the Federal Register.

### Petitioners Ask to Establish Content Vendor Diversity Report

The FCC's Media Bureau has invited public comment on a Petition for Rulemaking that proposes the FCC establish an annual report on the diversity of staff and management at video programming content vendors. The joint petitioners include FUSE, LLC, Common Cause, the National Hispanic Media Coalition, Public Knowledge, and the United Church of Christ Media Justice Ministry. The Bureau's *Public Notice* (DA 22-567) announcing the proceeding in Docket 22-209 set the deadline for comments on July 22, and reply comments on August 22.

The petitioners propose the FCC require licensees and regulatees in broadcast, cable, broadband, and satellite services to collect diversity data from the vendors from which they obtain their programming content. The petitioners say that collecting such data would enhance the FCC's decision-making and inform the public.

Vendors that would be subject to this inquiry include linear programming networks, over-the-top linear content sources, applications made available on licensees' or regulatees' traditional or online platforms, production companies and studios providing content for distribution to consumers through advertiser-supported video-on-demand or subscription services, and other sellers of content.

For the purposes of the proposed report, the petitioners suggest that the FCC adopt the definition of the term minority used in the Office of Management and Budget's Statistical Policy Directive No. 16. This Directive provides a common framework for consistent data on race and ethnicity throughout the federal government. The petitioners ask the Commission to collect diversity information for at least four data sets: (1) ownership, (2) board membership, (3) senior leadership/management, and (4) full-time employees.

#### **Various Filings Transition to LMS**

The FCC's Media Bureau has announced in a *Public Notice* (DA 22-476) that several additional filings must now be submitted to the Commission using the online Licensing and Management System ("LMS"). Until recently, most of these filings were submitted via the Consolidated Database System ("CDBS"). After CDBS was retired in January, these filings were submitted manually via email.

The following filings must now be submitted through LMS:

- Request for FM Engineering Special Temporary Authorization ("STA")
- Request for Silent STA
- Request for Extension of Engineering and Silent STA

- Notice of Suspension of Operations
- Notice of Resumption of Operations
- AM/FM Digital Notification
- Modulation Dependent Carrier Level Notification
- Change of Primary Station Notification
- Tolling Notification
- Reduced Power Notification
- Withdrawal of Pending Application

Existing records of STAs and silent notifications in CDBS have been transitioned to LMS. However, it is not possible to request in LMS an extension of an STA originally filed in CDBS. Such a filing should be submitted as a request for an original STA with an explanation in an attachment.

## **Call Sign Reservations Move to LMS**

The FCC's Media Bureau has announced that the broadcast call sign reservation system will move to the Licensing and Management System platform effective June 22, 2022. The old Call Sign Reservation System will be decommissioned as of that date. The following call sign procedures must be handled on LMS as of then:

- Permittee initial call sign request
- Call sign change request
- Call sign exchange
- Contingent call sign change request filed in connection with a pending assignment or transfer-of-control application.

#### Regulatory Fees Proposed for Fiscal Year 2022 continued from page 1

percent for Wireless Telecommunications, and 33.74 percent for Wireless Competition. The 943 FTEs employed in all other bureaus and offices of the Commission are considered "indirect" FTEs, and are allocated proportionately to the number of direct FTEs in each of the core bureaus. The total amount to be collected, \$382 million, was then allocated to each of the core bureaus in proportion to each bureau's usage of direct FTEs. The Commission then determined the categories of regulatees within each bureau's area of

responsibility, and the number of regulatees within each category to arrive at the proposed fee for each entity. The Commission has used this formula in past years and is seeking public comment regarding its continuing validity. Comment is solicited only on the methodology for calculating the amount of fees, and not as to whether fees should be collected. The Communications Act requires the FCC to collect regulatory fees each year.

continued on page 8



# DEADLINES TO WATCH



#### **License Renewal, FCC Reports & Public Inspection Files**

June 1	Deadline to file license renewal applications for television stations in <b>Arizona</b> , <b>Idaho</b> , <b>Nevada</b> , <b>New Mexico</b> , <b>Utah</b> , and <b>Wyoming</b> .	July 10	Deadline for noncommercial stations to place quarterly report re third-party fundraising in Public Inspection File.	
June 1	Deadline to place EEO Public File Report in Public Inspection File and on station's website for all nonexempt radio and	July 10	Deadline for Class A TV stations to place certification of continuing eligibility for Class A status in Public Inspection File.	
	television stations in Arizona, the District of Columbia, Idaho, Maryland, Michigan, Nevada, New Mexico, Ohio, Utah, Virginia,	August 1	Deadline to file license renewal applications for television stations in <b>California</b> .	
	West Virginia, and Wyoming.	August 1	Deadline to place EEO Public File Report	
June 1			in Public Inspection File and on station's website for all nonexempt radio and television stations in California, Illinois, North Carolina, South Carolina and Wisconsin.	
	report on any adverse findings and final actions taken by any court or governmental administrative agency involving misconduct of the licensee, permittee, or any person or entity having an attributable interest in the station(s).	August 1	Deadline for all broadcast licensees and permittees of stations in California, Illinois, North Carolina, South Carolina, and Wisconsin to file annual report on any adverse findings and final actions taken by	
June	Television stations in <b>Arizona</b> , <b>Idaho</b> , <b>Nevada</b> , <b>New Mexico</b> , <b>Utah</b> and <b>Wyoming</b> begin broadcasting license renewal post-filing announcements within five business days		any court or governmental administrative agency involving misconduct of the licensee, permittee, or any person or entity having an attributable interest in the station(s).	
	of acceptance for filing of license renewal application and continuing for four weeks.	August	Television stations in <b>California</b> begin broadcasting license renewal post-filing	
July 10	Deadline to place quarterly Issues/Programs List in Public Inspection File for all full power radio and televisions stations and Class A TV stations.		announcements within five business days of acceptance for filing of license renewal application for filing and continuing for four weeks.	

#### **Deadlines for Comments in FCC and Other Proceedings**

DOCKET	COMMENTS	REPLY COMMENTS
(All proceedings are before the FCC unless otherwise noted.)		
Docket 22-137; NOI (FCC 22-29) Improving receiver performance	June 27	July 27
Docket 22-203; Public Notice (DA 22-535) Competition in the Communications Marketplace	July 1	Aug. 1
Dockets 14-165, 20-36; FNPRM (FCC 22-6) Unlicensed devices in the television band white spaces	July 1	Aug. 1
Docket 22-223; NPRM (FCC 22-39) FY 2022 Regulatory Fees	July 5	July 18
Docket 22-209: Public Notice (DA 22-567) Petition for Rulemaking re New Content Vendor Diversity Report	July 22	Aug. 22
Docket 03-185; Fifth FNPRM (FCC 22-40) Franken FMs	July 18	Aug. 1



#### **Paperwork Reduction Act Proceedings**

The FCC is required by the Paperwork Reduction Act to periodically collect public information on the paperwork burdens imposed by its record-keeping requirements in connection with certain rules, policies, applications and forms. Public comment has been invited about this aspect of the following matters by the filing deadlines indicated.

TOPIC	COMMENT DEADLINE
Audio description of video programming, Section 79.3	June 27
TV Broadcasters Relocation Fund Reimbursement Form, Form 2100, Schedule 399	July 1
Commercial broadcast ownership report, Form 323	July 11
Experimental authorizations, Section 73.1510	Aug. 5
FM translator and booster station time of operation, Section 74.1263	Aug. 5
Satellite network non-duplication protection, and satellite syndicated program exclusivity rules, Sections 76.122, 76.123, 76.124	Aug. 9
FM license application form, Form 2100, Schedule 302-FM	Aug. 12
AM pre-sunrise authorization, Section 73.99	Aug. 12

# **Lowest Unit Charge Schedule for 2022 Political Campaign Season**

During the 45-day period prior to a primary election or party caucus and the 60-day period prior to the general election, commercial broadcast stations are prohibited from charging any legally qualified candidate for elective office (who does not waive his or her rights) more than the station's Lowest Unit Charge ("LUC") for advertising that promotes the candidate's campaign for office. A lowest-unit-charge period is upcoming in the following states.

STATE	ELECTION EVENT	DATE	LUC PERIOD
Colorado	State Primary	June 28	May 14 – June 28
Illinois	State Primary	June 28	May 14 – June 28
New York	State Primary	June 28	May 14 – June 28
Oklahoma	State Primary	June 28	May 14 – June 28
Utah	State Primary	June 28	May 14 – June 28
Maryland	State Primary	July 19	June 4 – July 19
Arizona	State Primary	Aug. 2	June 18 – Aug. 2
Kansas	State Primary	Aug. 2	June 18 – Aug. 2
Michigan	State Primary	Aug. 2	June 18 – Aug. 2
Missouri	State Primary	Aug. 2	June 18 – Aug. 2
Washington	State Primary	Aug. 2	June 18 – Aug. 2
Tennessee	State Primary	Aug. 4	June 20 – Aug. 4
Connecticut	State Primary	Aug. 9	June 25 – Aug. 9
Minnesota	State Primary	Aug. 9	June 25 – Aug. 9
Vermont	State Primary	Aug. 9	June 25 – Aug. 9
Wisconsin	State Primary	Aug. 9	June 25 – Aug. 9
Hawaii	State Primary	Aug. 13	June 29 – Aug. 13
Alaska	State Primary	Aug. 16	July 2 – Aug. 16
Wyoming	State Primary	Aug. 16	July 2 – Aug. 16
Florida	State Primary	Aug. 23	July 9 – Aug. 23
Massachusetts	State Primary	Sep. 6	July 16 – Sep. 6
Delaware	State Primary	Sep. 13	July 30 – Sep.13
New Hampshire	State Primary	Sep. 13	July 30 – Sep. 13
Rhode Island	State Primary	Sep. 13	July 30 – Sep. 13
	·	-	



## DEADLINES TO WATCH



#### **Proposed Amendments to the Television Table of Allotments**

The FCC is considering a petition to amend the digital television Table of Allotments by changing the channel allotted to the community identified below. The deadlines for submitting comments and reply comments are shown.

COMMUNITY	STATION	PRESENT CHANNEL	PROPOSED CHANNEL	COMMENTS	REPLY COMMENTS
Orono, ME	WMEB	*9	*22	July 7	July 22

#### (\*) *Indicates that the channel is reserved for noncommercial use.*

#### **Proposed Amendments to the FM Table of Allotments**

The FCC is considering a request to amend the FM Table of Allotments by adding a new channel for the community identified below. The deadlines for submitting comments and reply comments are shown.

COMMUNITY	NEW CHANNEL	NEW FREQUENCY	COMMENTS	REPLY COMMENTS
Big Coppitt Key, FL	265C3	100.9	July 11	July 26

DEADLINE FOR LPTV, TV TRANSLATOR, AND FM STATIONS AND MVPDS TO FILE CLAIMS FOR TV REPACK REIMBURSEMENT

**SEPTEMBER 6, 2022** 

#### Write-In Candidate Denied 'Legally Qualified' Status continued from page 1

Act prohibits broadcasters from censoring the messages of legally qualified candidates and requires stations to afford equal opportunities to the opponents of candidates whose messages are aired. Legally qualified candidates for federal office enjoy a right to reasonable access to commercial stations under Section 312(a)(7) of the Act. Pursuant to Section 315(a) of the Act and Section 73.1940 of the FCC's Rules, legally qualified candidates may purchase broadcast airtime at the station's lowest unit rate during a specified period prior to an election.

The Bureau explained that to be a legally qualified candidate for the purposes of these rules, a person must (1) publicly announce an intention to run for office; (2) be qualified to hold the office being sought; and (3) have qualified for a place on the ballot or have publicly committed to seeking election by write-in. A write-in candidate must make a substantial showing that they are a bona fide candidate for the office being sought.

In the substantial showing, the write-in candidate must provide evidence of engaging to a substantial degree in activities commonly associated with political campaigning. Such activities would include making campaign speeches, distributing campaign literature, issuing press releases, maintaining a campaign committee, and establishing a campaign headquarters.

Not all of the activities on the list are necessarily required,

and the list is not exclusive. There may be additional activities that would contribute to such a demonstration.

According to the Bureau, Condit stated in his complaint that he had announced in July 2020 his intention to run for Congress. On August 14, 2020, he registered with the Hamilton County, Ohio, Board of Elections to be a writein candidate in the 2020 election for representative from the 2nd Congressional District of Ohio in the United States House of Representatives.

Around September 1, Condit contacted the stations to buy airtime for his campaign spots. The stations' sales staff requested information about his campaign, which Condit provided. Thereupon the stations began broadcasting Condit's ads. However, after running the spots for about three weeks, Citicasters staff suspended broadcasting Condit's advertisements and asked Condit to provide additional information to support his substantial showing about his campaign activities. Condit provided an initial response on September 21 (in which he stated that his main campaign activity consisted of his radio advertising). The following day, he supplemented his showing with more detailed information. Condit explained that he made campaign speeches and attended events, distributed campaign literature, maintained a campaign headquarters, utilized yard signs and bumper stickers,

continued on page 7

#### Write-In Candidate Denied 'Legally Qualified' Status continued from page 6

operated a campaign committee, established a website, and *intended* to issue press releases. Citicasters staff reviewed this information and determined that Condit had failed to provide a substantial showing and that he was not, therefore, a legally qualified candidate. It followed that he was not entitled to reasonable access to the station's airwaves and broadcast of his messages was terminated.

Condit filed his complaint with the FCC on October 18. He maintained that Citicasters staff had originally found him to be qualified, and then decided that they did not like the content of his messages. Condit alleged that Citicasters then asked him for more information about his campaign as a pretext to terminate the carriage of his spots. Condit concluded that this was censorship and a violation of the political broadcasting rules. He accused Citicasters of acting in bad faith and took issue with the licensee's unilateral determination that he was unqualified.

In response, Citicasters explained that its sales staff had initially been under the impression that Condit was a legally qualified candidate because his name would appear on the ballot. However, upon hearing Condit's ads and an interview he gave on an Internet program, and reviewing his website, Citicasters' staff concluded that Condit had no genuine intention of seeking public office. Citicasters theorized that Condit had manufactured a sham political campaign to gain access to the airwaves to promote his beliefs to a large audience.

The Media Bureau's analysis of Condit's supplemental information supported Citicasters' conclusion that he was not a legally qualified candidate. The allegedly campaignrelated events in which Condit claimed to have participated were at six locations outside of the 2nd Congressional District. Commission precedent holds that, to qualify, the campaign activities must occur within the geographic area of the jurisdiction for which the candidate is seeking office. Condit claimed to be active within the 2nd District, but his activities, such as shopping and attending religious services, were not campaign related, and therefore did not support his showing. Condit said he had handed out business cards at undisclosed locations in the 2nd District on unspecified dates as he went about his daily life. He asserted that he distributed campaign literature and bumper stickers to potential voters and posted a few yard signs. However, he conceded that the literature was merely old, dated

brochures, and he did not indicate when, where or how extensively these materials were distributed. He maintained that he participated in meetings and conference calls. The Bureau said these vague and undocumented explanations did not support a finding of a substantial showing.

The Media Bureau rejected Condit's claim that the advertising that he bought—and which the stations broadcast prior to its suspension—should count toward his substantial showing of campaign activity. An otherwise unqualified candidate cannot bootstrap himself into qualified status by adding the purchase of airtime to an otherwise deficient showing.

In a break with most of the rest of the ruling, the Media Bureau rejected Citicasters' characterization of Condit's home-based campaign headquarters. Citicasters disparaged this set-up as nothing more than a table and a few chairs. The Bureau said that the Commission does not dictate how a campaign headquarters should be furnished. The Bureau credited the headquarters in Condit's favor even though it was located outside of the 2nd Congressional District. The rule acknowledges as legitimate a campaign headquarters at the candidate's home. Condit's home is just outside of the 2nd District, and there is no FCC requirement that a representative reside within the district he or she seeks to represent.

The Media Bureau concluded that Condit could legitimately claim as elements of his substantial showing his website, his campaign headquarters, and one interview he gave on an Internet program. This list, however, was deemed insufficient to demonstrate that Condit had maintained a serious campaign. The Bureau ruled that Condit had not met the standard of a legally qualified candidate.

The Media Bureau rejected Condit's accusation that Citicasters had acted in bad faith, and had stopped broadcasting his spots on the basis of their content. It found no evidence to support such a claim. The Bureau confirmed that the broadcaster has the initial responsibility to make good faith judgments about whether a party seeking access to its airtime is a legally qualified candidate, and that the broadcaster's judgment is entitled to deference.

#### Regulatory Fees Proposed for Fiscal Year 2022 continued from page 3

The tables at the end of this article show the proposed fees for most types of authorizations of interest to broadcasters, except for full power television stations. Broadcast radio fees are graduated to account for the size of the facility and the population within the station's service area. The fees for full power television stations are based entirely upon the population within the station's projected noise-limited service contour as shown in the FCC's *TVStudy* database. The population figure is multiplied by \$0.008803 to calculate the amount of the regulatory fee for that station. The amounts of the proposed fees for each commercial television station are listed in Appendix G to the *Notice of Proposed Rulemaking*, which can be found at: https://docs.fcc.gov/public/attachments/FCC-22-39A1.pdf

The Commission has previously determined that if an entity's total aggregated regulatory fee liability is less than \$1,000, it will be considered de minimis and exempt from collection. The law permits the Commission to exempt a party from paying the fee if, in the agency's judgment, the cost of collecting the fee would exceed the amount to be collected. The National Association of Broadcasters has suggested to the Commission that the de minimis threshold should be increased in order to assist small broadcasters. The Commission invites public comment on this question with the caveat that the statute does not include language to suggest that this factor can be taken into consideration.

Comments must be submitted to the Commission by July 5. Reply comments will be due by July 18.

#### **REGULATORY FEES FOR FISCAL YEAR 2022**

Type of Authorization	Actual FY 2021	Proposed FY 2022
Full Power TV Construction Permit	\$ 5,100	\$ 5,210
Class A TV, LPTV, TV/FM Translator & Booster	320	340
AM Radio Construction Permit	610	690
FM Radio Construction Permit	1,070	1,210
Satellite Earth Station	595	615

#### **ACTUAL FY 2021 REGULATORY FEES FOR RADIO**

Population Served	AM Class A	AM Class B	AM Class C	AM Class D	FM A, B1, C3	FM B,C,C0,C1,C2
0-25,000	\$ 975	\$ 700	\$ 610	\$ 670	\$ 1,070	\$ 1,220
25,001-75,000	1,465	1,050	915	1,000	1,605	1,830
75,001-150,000	2,195	1,575	1,375	1,510	2,410	2,745
150,001-500,000	3,295	2,365	2,060	2,265	3,615	4,125
500,001-1,200,000	4,935	3,540	3,085	3,390	5,415	6,175
1,200,001-3,000,000	7,410	5,320	4,635	5,090	8,130	9,270
3,000,001-6,000,000	11,105	7,975	6,950	7,630	12,185	13,895
6,000,000+	16,665	11,965	10,425	11,450	18,285	20,850

#### PROPOSED FY 2022 REGULATORY FEES FOR RADIO

Population Served	AM Class A	AM Class B	AM Class C	AM Class D	FM A, B1, C3	FM B,C,C0,C1,C2
0-25,000	\$ 1,105	\$ 795	\$ 690	\$ 760	\$ 1,210	\$ 1,380
25,001-75,000	1,660	1,195	1,035	1,140	1,815	2,070
75,001-150,000	2,485	1,790	1,555	1,710	2,725	3,105
150,001-500,000	3,735	2,685	2,330	2,570	4,090	4,665
500,001-1,200,000	5,590	4,025	3,490	3,845	6,125	6,985
1,200,001-3,000,000	8,400	6,040	5,245	5,775	9,195	10,490
3,000,001-6,000,000	12,585	9,055	7,860	8,655	13,780	15,720
6,000,000+	18,885	13,585	11,790	12,990	20,680	23,585

The Pillsbury Law ANTENNA™ is an information service about current events in communications law published by Atlantic Star Media, Inc. This publication is produced only to report on current events and factual matters in the field of communications law. Publication and dissemination of this material is not intended to constitute the practice of law or the rendering of legal advice. No attorney-client relationship shall be deemed to exist between the provider and the reader or between the publisher and the reader as a result of the publication, dissemination, distribution or other use of this material. The publisher makes its best effort to ensure that the information reported is accurate, but no warranty, express or implied, is given as to the accuracy or completeness of any information or statement published herein. Copyright 2022 by Atlantic Star Media, Inc. All rights reserved.