

# Client ALERT

## **Broadcast Client Advisory: June 24, 2016 Effective Date for Expanded On-Line Public Files**

May 13, 2016

The FCC has announced that its expanded requirements for on-line public files will become effective June 24, 2016.

Commercial radio stations in the top 50 Nielsen markets with five or more full-time employees must begin uploading new public file documents to the FCC's online database on that date. Existing public file materials must be uploaded by December 24, 2016.

There are three primary exceptions. First, the FCC should automatically transfer to the on-line file all materials already filed in electronic form (including most applications and reports), or that were generated by the FCC itself (such as authorizations). Second, existing political file materials may continue to be retained in a local physical file (or be accessible by computer) for the remainder of their two-year retention period, unless the licensee voluntarily elects to upload them. Third, both existing and new letters and emails from the public are not to be uploaded to the on-line file, but must also be kept locally for two years.

Subject to the same three exceptions, the on-line file requirement will apply on March 1, 2018 to all other stations, including all non-commercial educational stations and all stations that are either outside the Top-50 markets or have fewer than five full-time employees.

Also on June 24, 2016 the FCC will require television stations to begin using its new, improved online public inspection file ("OPIF") system in lieu of the current online broadcast public inspection file ("BPIF") that has been in place since 2012. The FCC notes that although the look and feel of the two databases will be somewhat different, access and uploading should be virtually identical. It intends to move all documents in BPIF to OPIF by midnight on June 24, 2016.

The FCC will conduct a live Webinar to demonstrate the new OPIF at a date to be announced. In the meantime, OPIF can be accessed in demonstration mode at <https://publicfiles-demo.fcc.gov/admin/> for stations and at <https://publicfiles-demo.fcc.gov/> for members of the public.

If you would like additional information, please contact [Peter Gutmann](#) or any member of the firm's [Communications Group](#).



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