

NON-SUBSTANTIVE CHANGE REQUEST JUSTIFICATION
OMB CONTROL NUMBER 3060-0110
Form 2100, Schedule 303-S – Renewal of Broadcast Station License¹

The Commission is submitting this non-substantive change request to the Office of Management and Budget (OMB) for approval of minor non-substantive changes made to (current) FCC Form 303-S, Application for Renewal of Broadcast Station License (FCC Form 303-S). FCC Form 303-S is used to apply for renewal of license of a commercial or noncommercial educational AM, FM, TV, Class A TV, FM translator, TV translator, Low Power TV or Low Power FM broadcast station in the current Media Bureau database system, the “Consolidated Database System” (CDBS). The Media Bureau is transitioning to a new on-line (electronic) licensing database system called the “Licensing Management System” (LMS) in which all Media Bureau broadcast applications and reporting forms will eventually be filed. In effect, the database transition requires a corresponding design conversion of all existing CDBS forms. The Media Bureau is currently developing electronic, LMS-compatible versions of various broadcast station application and reporting forms, such as this Form 2100, Schedule 303-S – Renewal of Broadcast Station License (LMS Renewal Application) as part of the database transition.

In general, the new LMS Renewal Application will replicate the FCC Form 303-S. The form sections and substance of the individual questions essentially remain the same. As with the (current) FCC Form 303-S, the LMS Renewal Application requires applicants to certify compliance with statutory and regulatory requirements. The application is presented primarily in a “Yes/No” certification format and contains places for submitting explanatory exhibits where appropriate. In one instance, as outlined below as Change #2, the Online Public Inspection File questions in the LMS Renewal Application have been updated from the corresponding Local Public File questions in the (current) FCC Form 303-S. This update reflects the recent rule changes, which now require that all public information for broadcast stations be posted online at a central site hosted by the FCC. OMB has already approved the Commission’s transition from a “Local Public File” requirement to the “Online Public Inspection File” requirement.

In the initial phase of the LMS roll-out, the LMS Renewal Application is replacing FCC Form 303-S only for the filing of renewal of Radio broadcast station license applications in LMS (e.g., AM, FM, FM translator, Low Power FM). The Commission will subsequently roll-out the use of the LMS Renewal Application for TV broadcast stations at a later date.²

The respondents, burden hours and costs of this Information Collection are not impacted by the minor non-substantive changes to the FCC Form 303-S, which will now be a part of the LMS Renewal Application. The minor non-substantive changes are highlighted below:

Change #1 – To accommodate the Media Bureau’s database transition from CDBS to LMS, FCC Form 303-S will be replaced by a LMS-compatible LMS Renewal Application. The certification-based questions and explanatory exhibit format remains the same. The substance, respondents, burden hours, and costs of Information Collection OMB Control No. 3060-0110 are not impacted.

¹ Pursuant to this non-substantive change, CDBS-based FCC Form 303-S will be renamed “Form 2100, Schedule 303-S – Renewal of Broadcast Station License” and encompassed within the new on-line (electronic) licensing database system called the Licensing Modernization System. Accordingly, the title of this Information Collection is also being changed.

² Until the Commission’s subsequent roll-out of the new LMS Renewal Application, FCC Form 303-S will continue to be used by TV broadcast stations in the CDBS system.

Change #2 – FCC Form 303-S, Sections III and IV, Question 3, “Local Public File,” will be renamed as “Online Public Inspection File” question in the new LMS Renewal Application.

This simply tracks the Commission’s recent adoption of a series of Orders³ requiring broadcast licensees to post their public inspection files to an FCC-hosted online database.⁴

Also, the Supporting Statement for OMB Control No. 3060-0110 has been updated accordingly.

³ In 2012, the Commission adopted online public inspection file rules for television broadcasters that required them to post public file documents to a central, FCC-hosted online database rather than maintaining files locally at their main studios. *Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Second Report and Order, FCC 12-44, 27 FCC Rcd 4535 (2012). In January 2016, the Commission adopted an expanded online public file order, *Expansion of Online Public File Obligations to Cable and Satellite TV Operators and Broadcast and Satellite Radio Licensees*, Report and Order, FCC 16-4, 31 FCC Rcd 526 (2016), in which it added cable operators, DBS providers, broadcast radio licensees, and satellite radio licensees to the list of entities required to post their public inspection files to the FCC-hosted online database.

⁴ The rules adopted in the Commission’s online public file orders were previously approved by OMB under Information Collection OMB Control No. 3060-0214. Final approval for the information collection requirements in FCC 12-44 were approved by OMB on June 21, 2012. See Notice of Action OMB ICR Reference Number 201205-3060-005. Final approval for the information collection requirements in FCC 16-4 were approved by OMB on May 4, 2016. See Notice of Action OMB ICR Reference Number 201602-3060-020.