Quarterly Issues/Programs List Reminder

Next Report Due in Public Inspection File by
April 10, 2024

The next Quarterly Issues/Programs List covering January, February and March must be uploaded to your station's online inspection public file by April 10.

Quarterly Issues/Programs Lists are required for all commercial and noncommercial full-power radio and TV stations (including Class A TV stations). These Lists are required by the FCC to demonstrate how a broadcast station served the needs and interests of its community of license and its service area. Serving the needs and interests of a station's service area is required by the Communications Act, and the Quarterly Issues/Programs Lists are the only documents required by the Commission to be routinely prepared to demonstrate to the public how a station has been providing that service. The Lists must demonstrate that the station has met its obligation to serve the public interest through issue-responsive programming.

The FCC reviews these Lists when radio and television stations file their license renewal applications. At that time, the FCC staff will routinely evaluate the Lists from the entire 8-year license term. In past license renewal cycles, the FCC penalized stations that had missing, incomplete, or inadequate Lists, even when the missing Lists were from early in the renewal term. The FCC also reviews these Lists during random inspections or when there are complaints. Because these documents can be reviewed by the public and the FCC at any time simply by looking at the station's online public inspection file, it is very important that these Lists be completed accurately and uploaded on a timely basis. During the last decade, the failure to maintain these Lists has led to more fines on broadcasters than for any other violation.

This reminder is designed to help answer some questions about these Lists: What are they? What am I supposed to do and when? What are some best practices? What does a sample List look like?

What is the Quarterly Issues/Programs List?

As mentioned above, the Quarterly Issues/Programs List is a broadcast station's official record of the programming it broadcast which was responsive to the most significant issues facing its community of license. While there is no official form from the FCC for a station to use to complete these Lists, the FCC does require that certain information be included. **A complete Quarterly Issues/Programs List will first include a list of the significant issues facing the station's community that were addressed in its programming in the prior three months. For each issue identified, the station should list several programs or program segments that addressed the issue in a significant manner. For each such issue-responsive programming, the description should include: (1) the issue that the program addresses; (2) the name of the program or segment that covered the issue; (3) the date and time the program or segment aired; (4) the duration of the program or segment; and (5) a narrative describing how the issue was treated.** See the sample at the end of this reminder to see how this looks in practice.

What Issues Do I Address?

To put together a Quarterly Issues/Programs List that shows how the station responded to the significant issues facing its community, the station first must determine what those issues are. The FCC no longer specifies the process that stations must use to determine what the issues are. The FCC once required that stations have regular meetings with community leaders to determine the issues facing the community, and to routinely survey the general public in the service area. While no longer required, some stations still maintain the practice of regular meetings with community leaders as a good way to connect with different groups within their service areas.

Other stations identify issues in other ways. No doubt, many of your employees are involved in community organizations. Station management should regularly solicit ideas from these employees as to what issues are important to the groups to which they belong and to the broader audience within their station's service area. News stations can learn about what is on the community's collective mind through their reporting. Coverage of events (school board meetings, city council hearings, police press conferences, etc.) in a community can also highlight issues, as can guests on public affairs programming. A station and its employees can also monitor what is being covered by local news stations, read local newspapers, attend civic events, participate in religious and social organizations, sign-up for press releases from local elected officials and government agencies, and even speak with friends and neighbors to determine the issues facing the community.

No matter how it is done, station management should adopt regular practices for making the identification of the issues of importance to the station's community. The station's management should follow the procedures to come up with a number of issues currently of importance to its community. While the FCC no longer specifies exactly how many issues should be identified each quarter, they once required that each station list 5 to 10 issues. That is still a good rule of thumb.

These issues should be identified early in the quarter, so that the station has time to develop programming that is responsive to the issues. The issues do not have to be the same for each station in a community. In fact, only in smaller communities with few radio stations is a station expected to cover all issues facing the community. In communities with multiple stations targeting different segments of the community, a station's issue-responsive programming should be aimed at addressing the issues most relevant to the audience of that station.

What Programming Should be Included to Address Each Issue?

There is no required amount of programming a station must air to meet its public interest obligation. As the Lists are the only official record you have of how your station served the public interest during the previous calendar quarter, you should come down on the side of being over-inclusive. At license renewal time, it is better that FCC staff have plenty of programs which address each issue to review rather than risking that they determine that the station did not fulfill its obligation to serve the public interest in its community.

Issue-responsive programming can come in many forms. These programs can be segments of news programs or public affairs shows. They can be parts of call-in broadcasts. They can be locally produced programs or syndicated and network programs. They can even be what is normally considered to be an entertainment program if, during that program, there is a meaningful discussion of an issue of importance to the community.

While the FCC has recognized that Public Service Announcements (PSAs) can address community issues and can be included in Issues/Programs Lists, the FCC has said that ***PSAs should never be the only programming to address any issue***. There should always be some more substantive programming to address each of the listed issues.

State broadcast associations sometimes originate public interest programming that can address issues of importance to your community. Educational institutions and community groups may also be sources of programming about local issues that, if broadcast on your station, can be included as part of the issue-responsive programming reported in the Quarterly Issues/Programs Lists.

A station owes its primary obligation to its community of license, and a secondary obligation to the remainder of its service area. Make sure that your station's programming addresses issues relevant to both the community of license and the greater service area.

What Are Some Best Practices to Follow?

A station's Quarterly Issues/Programs List must demonstrate the station's treatment of significant community issues, and, to that end, the List should be easy to read and digest by the FCC staff and the public. While there is no one way to accomplish this, we have provided a sample at the end of this reminder.

You should have an established policy for making sure station staffers are sharing with station management what they hear when out in the community. This can be as simple as making a discussion of community issues a regular part of a station's programming or staff meetings. News and programming personnel can report on their own experiences speaking with people in the community about the issues that are on their minds (any station staffer who has done a remote broadcast from a shopping mall or car dealership knows that members of the community are eager to share what issues they care about and what local issues the station should cover). Include the station's entire staff in such discussions as they are all members of the community who care about local issues and who may have different perspectives on the issues facing the community. Especially in bigger markets with bigger station clusters, input from station personnel is a good way to learn about what's happening in the city's different neighborhoods and suburbs. Publicize how your employees can relay to the staff members who prepare the Lists what issues have been covered on station programs – so even a spontaneous on-air discussion of a community issue does not get lost after it is broadcast, but instead is recorded and reported on the next List.

Finally, keep up with the preparation of the Lists throughout the quarter, so station staff are not scrambling at the 11th hour to compile the lists. Rushing to post something at the last minute is likely to result in mistakes and omissions. The FCC's online public inspection file often has technical glitches that can cause a last-minute filing to be uploaded late.

When are Quarterly Issues/Programs Lists Due?

The Quarterly Issues/Programs List must be uploaded to your public file on or before the 10th day of the month that follows the end of the quarter. **The first quarter list (January, February, and March) must be uploaded by April 10. The second quarter list (April, May, and June) must be uploaded by July 10. The third quarter list (July, August, and September) must be uploaded by October 10. The fourth quarter list (October, November, and December) must be uploaded by January 10**. All documents in the online public inspection file are time stamped as to when they were uploaded – giving the FCC an easy way to check on the timeliness of the filing. At license renewal time, the station must certify not only that it uploaded to the public file all required documents, but also that it did so in a timely fashion. Falsely certifying that you uploaded everything on a timely basis, despite evidence in your public file to the contrary, is a serious issue. Therefore, make sure that these lists are timely uploaded.

Frequently Asked Questions

My station airs a lot of public service announcements from local and national organizations. Am I covered? PSAs from local and national organizations about local and national issues can be included in your Quarterly Issues/Programs Lists. However, do not rely solely on PSAs to address any issue. The FCC wants stations to address each issue through news, public affairs, political, and other programming and with a mix of long-form and short-form (including PSAs) programming. Each issue should be addressed in some substantive way.

I uploaded the List by the due date and then realized that I made a mistake. Should I delete that file, fix the mistake, and upload it again? No. The FCC's online public inspection file records the date on which you uploaded a file. Thus, the FCC staff can determine if a file has been timely uploaded (i.e., by January 10, April 10, July 10, and October 10). Only if you uploaded the list on or before the due date and there is still time to delete the file, fix the mistake, and upload it again before 11:59 PM on the due date, should you delete the original upload. ***If, however, the due date has passed before you noticed the mistake, do not delete the file***. Instead, upload to the public file the correction, explain the mistake, and note that you didn't notice the mistake until after the due date while leaving the original document in the file.

I run three stations. Can I do a combined List and post it to each station's public file? Generally, no. Quarterly Issues/Programs Lists report on the programming of each individual station. The reports should generally be compiled on a station-by-station basis. Only where programming is simulcast across multiple stations can that programming be reported on the reports of more than one station.

I cover community issues on the station website and do lots of community events. Should these efforts be reported on the Quarterly Issues/Programs Lists? The FCC created the Lists to report on the station's on-air activities, and the station's service to the public will be judged on what it broadcast. But, if your non-broadcast activities are promoted on the air, you can include those on-air promotions in your Lists. But treat these promotions like PSAs – they can add to the other

programming you do to address an issue, but they should never be the only programming to address the issue.

I run an all-music format. A community affairs program would not fit with my format. So am I exempt? No. Find or create some community affairs programming and air it regularly. Or be diligent in collecting information about what your DJs are saying on air about community issues and events – for example, the DJ's discussion about her long commute into work because of traffic can be a programming responsive to an issue of importance if traffic or commuting or urban sprawl are issues in the community and if the on-air discussion substantively addresses one of these issues relevant to the community.

Sample Quarterly Issues/Programs List

Issues/Programs List
WXYZ – Anytown, USA
1st Quarter 2024

In this quarter, the WXYZ has determined that the most significant issues of importance to our community are as follows:

- Crime
- Health
- Education
- Town Beautification
- The Economy
- Traffic

The list below reflects some of the programming broadcast in this quarter that show how WXYZ responded to and treated those issues. This list does not include all the issues responded to by the station or all the ways the station responded to those issues.

Issue	Name of Program/Segment	Date of Airing	Time of Airing	Duration	Narrative of How the Issue was Treated
Crime	This Week with Bob Jones	March 8, 2024	8:00AM	30 min.	Station host Bob Jones invited to the show Second Amendment advocate John Smith and gun control advocate Shannon Jackson to discuss the growing problem of access to guns and gun violence in the community
Crime	AAA Network News	January 3, 2024	6:43PM (approx.)	3 min.	An interview with the chief of police of Big City, USA talking about how community policing has reduced violent crime
Crime	PSA	Throughout the month of February	Throughout the day – aired approximately 45 times	30 seconds each	PSAs from the Anytown Police Department providing tips to secure home and property
Crime	Anytown University Spotlight	January 28, 2024	9:00PM	12 min.	Segment of program devoted excerpts from the remarks of a University guest speaker discussing law enforcement issues and careers
Health /	Special coverage of Governor Jones speech on a measles outbreak at Big City High School	March 11, 2024	9:00PM	30 min.	The station aired Governor Jones' address to the state regarding the measles outbreak at Big City High School
Health	Noon Newsbreak	March 14, 2024	12:00PM	2 min.	During the station's newsbreak, the on-air staff gave a recap of the March 13 press conference at the Anytown Hospital about plans for its emergency room expansion.
Health	The Morning Show with A & J	March 18, 2024	7:15AM	10 min.	The head of the state department of health called into the show to discuss the pandemic and how people can best protect themselves during the flu season.

Issue	Name of Program/Segment	Date of Airing	Time of Airing	Duration	Narrative of How the Issue was Treated
Health	Public Service Announcement	March 24, 2024 (repeated 12 times from March 24-31)	6:21PM	1 min.	Public service announcement from the State Health Department (through our state broadcasters association) about the current state of emergency room care and how listeners can learn more about ways to stay healthy

SIMILAR PROGRAM DESCRIPTIONS SHOULD BE PROVIDED FOR EACH OF THE OTHER LISTED ISSUES.