

## Reminders for Broadcasters Facing COVID-19 Challenges

March 20, 2020

Cooley understands that broadcasters are facing significant challenges related to the COVID-19 pandemic. We offer the following reminders as you deal with those challenges.

- 1. The Federal Communications Commission released [guidance for stations](#) that may be sharing news and news gathering resources to cover the COVID-19 crisis.** The FCC clarified that any temporary shared news gathering efforts, including oral agreements, that occur over the duration of this emergency news event and are related to COVID-19 coverage, *do not* need to be referenced in any manner in the stations' online public inspection files. Any agreements that arose during or due to the emergency event that will continue beyond the current crisis (and so will not be temporary) must be reduced to writing and placed in the stations' online public files.
- 2. As this pandemic evolves, stations may air emergency programming that requires compliance with the FCC's accessibility rules.** Those rules require stations to make all "critical details" regarding an emergency and how to respond to it accessible to visually and hearing-impaired viewers. Emergency information is defined as "information, about a current emergency, that is intended to further the protection of life, health, safety and property." Depending on the specific situation in your community, emergency information could include information about a new curfew or shelter-in-place requirement or instructions on when and how to seek medical care in a particularly hard-hit area. If your community does go under lockdown, the US Department of Homeland Security has issued letters that may be used by broadcasters to help facilitate access to station studios and transmitters and obtain fuel as states and localities tighten their restrictions. Please contact us if you need copies of these letters.
- 3. The FCC is operational, with its staff working remotely.** While there has been no blanket extension of filing or other regulatory deadlines, including children's programming reports and issues and programs lists, the FCC has signaled its intention to work with broadcasters facing material disruption from COVID-19.

Please contact a member of the [communications team](#) if you have any questions.

[Coronavirus resource hub](#)

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