

Foreign Adversary Certification Proposed for All Broadcast Licensees and Applicants

The FCC has proposed new rules that would require all entities that it regulates, including all broadcast applicants and licensees, to file certifications as to whether or not foreign adversaries have involvement in or connections with the ownership or control of the regulatee. This action comes in the context of a broad government effort to detect and thwart infiltration by foreign adversaries into the nation's communications infrastructure. The Commission states that the purpose of this certification and information collection would be to illuminate threats from foreign adversaries to U.S. communications networks. The Commission promulgated this proposal in a *Notice of Proposed Rulemaking* (FCC 25-28) in Docket 25-166.

continued on page 6

Mostly Lower Regulatory Fees Proposed for FY 2025

The Communications Act requires the FCC to impose fees on the entities that it regulates for the purpose of offsetting the cost of operating the agency. The total amount to be collected for the fiscal year ending September 30, 2025, is \$390,192,000. The Commission calculates the approximate cost for overseeing each regulated entity with a formula that assigns the expense for full-time equivalent personnel ("FTE") to each bureau, and then divides the bureau total among each category of regulatee relevant to the bureau (such as licensed FM stations). That total is then divided among the individual entities within the category. Each year in preparing the proposals for regulatory fees, the Commission recalculates and adjusts the FTEs assigned to each category to account for changes in personnel and regulatee populations.

The proposed allocation of fees among the FCC's regulatees for fiscal year 2025 is set out in a *Notice of Proposed*

continued on page 7

DIRS Exercise Set for June 16-18

The FCC's Public Safety and Homeland Security Bureau will conduct a voluntary test exercise of the Disaster Information Reporting System ("DIRS") on June 16-18. The Bureau announced and explained this event in a Public Notice (DA 25-470). The purpose of the exercise is to help ensure that communications providers, including broadcast, wireless, satellite, broadband, and wireline providers, can access and file reports in the DIRS system, and train new employees to become familiar with the DIRS reporting process.

DIRS is a web-based system through which the FCC collects information from communications providers during major disasters, such as hurricanes, wildfires, and earthquakes. When the system is activated, communications providers use it to report the operational status of their service and infrastructure, to submit updates about the progress of restoration of facilities and service, and to request assistance. The FCC compiles the data received and forwards status reports to federal emergency management officials. The DIRS data also form the basis for reports of aggregated restoration information,

continued on page 5

IN THIS ISSUE

Appeals Court Keeps AP Out of the White House Press Pool.....	2
Foreign Sponsorship ID Rule Becomes Effective.....	3
Deadlines to Watch.....	4-5

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Appeals Court Keeps AP Out of the White House Press Pool

The U.S. Court of Appeals for the District of Columbia Circuit has stayed a preliminary injunction adopted by the U.S. District Court that would have prevented the White House from acting on its decision to exclude the Associated Press's reporter(s) from participating in the White House press pool. Pending a decision on the merits of the case at the trial court, the White House is now free to bar the AP from the press pool. The sole reason for the White House's desire to exclude AP is AP's insistence on referring in its influential Stylebook to the body of water south of the southeastern United States as the Gulf of Mexico, rather than the Gulf of America, as President Trump has dubbed it. The AP Stylebook is a reference guide widely used throughout the media. This decision addresses weighty First Amendment issues that gave rise to both concurring and dissenting lengthy opinions. While this case specifically concerns media coverage of the President of the United States, the principles being litigated may pertain to many other circumstances involving news media coverage of government officials on any level.

The White House press corps consists of more than 1,300 holders of "hard passes" whom the government has vetted and who are permitted access to the White House press facilities. The criteria for press corps membership have evolved over time, but it is undisputed that the White House may not exclude reporters from the corps based solely on their viewpoint. The press pool is a smaller subset of the corps, consisting of from 13 to 32 journalists, depending on the event being covered and the space available. Until recently, the membership in the press pool has been determined by the White House Correspondents' Association. However, the White House has now undertaken to select pool members itself. The press pool typically is the group that may attend the President in smaller venues, such as in the Oval Office, on Air Force One, or at Mara-a-Lago. On the other hand, all members of the corps are permitted to attend briefings in the James S. Brady Briefing Room in the White House, on a space-available basis.

A preliminary injunction is an order requested at the outset of litigation to hold specific aspects in abeyance pending the outcome of the underlying proceeding. In this case the White House ejected the AP's journalist(s) from the press pool. AP sued White House officials, asking the court to order the White House to reinstate the AP. AP requested a preliminary injunction to prevent the White House's ejection action from taking effect until the case was resolved. The government appealed this ruling that granted the preliminary injunction to the Court of Appeals. This decision resulted. By a 2-1 vote, the Court of Appeals panel stayed the District Court's injunction and allowed the exclusion of AP from the pool to become effective.

In considering whether to grant a request for a preliminary injunction, or a stay, a court must consider four factors: (1) whether the applicant has shown that it is likely

to succeed on the merits; (2) whether the applicant will be irreparably harmed without a stay; (3) whether a stay would substantially injure other parties in the proceeding; (4) where the public interest lies. Both the majority and minority opinions relied heavily on their views about the first factor – whether the AP would prevail on the merits. The majority opined that the AP's arguments were not strong enough ultimately to win on the substantive merits of this case.

It is a long-standing principle of First Amendment law that private speech is protected in a public forum or in a forum in public facilities. Speakers cannot be excluded from participating for reasons related to the views they express. Courts have identified three types of fora: (1) the traditional public forum; (2) the public forum created by government designation; and (3) the nonpublic forum. This case turns on the definition of the nonpublic forum. The government and the court majority view the nonpublic forum as a specific physical place that must be designated as such by the government. AP and the court minority claim that the press pool itself is a type of organic nonpublic forum entitling its members to rights under the First Amendment, and that no one should be excluded from it merely on the basis of that party's views.

The majority cited precedent to define a nonpublic forum as government property that is not by tradition or designation a forum for public communication. Following precedent further, government property does not become a nonpublic forum unless and until the government takes some affirmative steps to open the space for private communication. The government creates a nonpublic forum when it provides selective access for individual speakers. The majority explained that the Oval Office is the President's office, over which he has absolute control and discretion to exclude the public or members of the press.

AP argued that when the Oval Office and similar spaces are opened to the press pool, they become nonpublic fora, therefore the White House may not withhold access on the basis of viewpoint. The majority opinion rejected this assertion for several reasons.

(1) Forum analysis pertains only to "communicative activities." The presence of the press pool in the Oval Office to witness a signing or a presidential presentation does not involve the type of communicative activities that would transform a restricted government space into a nonpublic forum.

(2) Communicative activities, as the term is used here, refers to the free exchange of ideas between citizens, discussing public questions. The members of the press pool typically only attend events in the Oval Office to witness them, and not to participate in debate.

(3) A space for which access is tightly controlled and highly selective, such as the Oval Office, cannot be transformed into a nonpublic forum.

continued on page 3

Foreign Sponsorship ID Rule Becomes Effective

Last year in the *Second Report and Order* (FCC 24-61) in Docket 20-299, the FCC amended its rules concerning the sponsorship identification requirements for leased-time programming (a category of on-air content that does not include ordinary commercial advertisements for goods or services) provided by a foreign government. When such programming is aired, disclosure of the foreign source must be made at the time of broadcast. Included in the new rules was a requirement for the broadcaster to exercise reasonable due diligence to ascertain whether programming aired under the terms of such a lease had been provided by a foreign government or a related foreign governmental entity.

Most of the amended or new rules adopted in this proceeding became effective on August 15, 2024. The provisions in the new Section 73.1212(j)(3) about station licensee due diligence concerning the ultimate source of programming required review and approval by the Office of Management and Budget. That review was completed and approval granted in May. Consequently, the due diligence rules became effective as of June 10, 2025. In its Public Notice (DA 25-507) announcing this development, the FCC's Media Bureau said that it would defer requiring

compliance with these due diligence provisions for six months, i.e., until December 8, 2025. Only new leases and renewals of existing leases entered into on or after the compliance date must comply with the rule modifications.

The new Section 73.1212(j)(3) requires the licensee of a station carrying leased airtime programming to conduct diligent ascertainment, including:

(1) informing the lessee of the sponsorship disclosure requirement;

(2) inquiring of the lessee whether the lessee falls into any of the categories of foreign governmental entities subject to the rule;

(3) inquiring of the lessee whether the lessee knows if anyone involved in the production or distribution of the programming qualifies as a foreign governmental entity;

(4) independently confirming the lessee's status by consulting the Department of Justice's FARA website and the FCC's semi-annual U.S.-based foreign media outlets reports;

(5) memorializing the inquiries made pursuant to paragraphs (1) through (4) so as to track compliance, and retaining such documentation in the station's records for the longer of the remainder of the station's current license term or one year.

Appeals Court Keeps AP Out of the White House Press Pool continued from page 2

(4) The fact that the President is communicating in these small venue events makes the event government speech, to which the First Amendment is inapplicable.

The majority further noted that the President may invite anyone he chooses into the Oval Office, or anywhere else, for a one-on-one interview. No one disputes that he can prefer interviewers on the basis of their viewpoint. Inviting multiple journalists into the Oval Office in the context of the press pool should be no different.

The majority observed that presidents have held crucial meetings and made historic decisions in the Oval Office and on Air Force One. Sometimes, the press pool has been invited to observe. However, these restricted presidential spaces are not First Amendment fora because the President retains absolute discretion over who has access. The court concluded that the White House is likely to succeed in this case on the merits, and accordingly it stayed the District Court's injunction.

The court's dissenting minority addressed the government's claim of irreparable injury by noting that "Until now, every United States president has had the fortitude to tolerate the presence in the White House and Oval Office of credentialed journalists known to disagree with one or more government-preferred viewpoints." The uncontested record evidence established that every president since at least Eisenhower has endured the proximity, on government property, of some member of the news media associated with a view the president disfavors. That "injury" is ubiquitous and inescapable in every public official's engagement in the

rough and tumble of the political arena. In the minority's view, the notion that the President of the United States could be irreparably harmed by attendance with the press pool of the carefully vetted, nondisruptive journalists who work for AP is "extraordinary."

The dissenting minority took issue with the majority's emphasizing that Oval Office events involve governmental speech because the President speaks there. The media's coverage of those events is not government speech. Members of the news media originate their communications on the basis of what they witness while covering an event. The speaking itself need not occur in the venue. To discriminate by viewpoint who gets to witness official events colors the accounts that the public receives.

While the dissent expressed the belief that special venues such as the Oval Office can certainly qualify as nonpublic fora, it also explained that the press pool itself is a nonpublic forum. The White House press pool is a forum even when it convenes outside of the White House, such as on Air Force One or at Mar-a-Lago. The dissent cited precedent for the notion that a "public space" may refer to a forum more in a metaphysical than in a spatial or geographic sense. Decisions in other cases have found such things as the federal government's Combined Federal Campaign charity drive and a public school's internet mail system to be fora for the purposes of First Amendment analysis.

The minority opinion continued that no judicial precedent supports denial of a government benefit or

continued on page 5



DEADLINES TO WATCH



License Renewal, FCC Reports & Public Inspection Files

June 1	Deadline to place EEO Public File Report in Public Inspection File and on station's Internet website for all nonexempt radio and television stations in Arizona, District of Columbia, Idaho, Maryland, Michigan, Nevada, New Mexico, Ohio, Utah, Virginia, West Virginia, and Wyoming.	July 10	Deadline for noncommercial stations to place quarterly report regarding third-party fundraising in Public Inspection File.
June 2	Deadline for all broadcast licensees and permittees of stations in Arizona, District of Columbia, Idaho, Maryland, Michigan, Nevada, New Mexico, Ohio, Utah, Virginia, West Virginia, and Wyoming file annual report on all 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).	July 10	Deadline for Class A TV stations to place certification of continuing eligibility for Class A status in Public Inspection File.
June 2	Mid-Term EEO review begins for certain radio stations in Arizona, Idaho, Nevada, New Mexico, Utah, and Wyoming , and certain television stations in Michigan and Ohio .	August 1	Deadline to place EEO Public File Report in Public Inspection File and on station's Internet website for all nonexempt radio and television stations in California, Illinois, North Carolina, South Carolina, and Wisconsin.
July 10	Deadline to place quarterly Issues and Programs List in Public Inspection File for all full service radio and television stations and Class A TV stations.	August 1	Deadline for all broadcast licensees and permittees of stations in California, Illinois, North Carolina, South Carolina, and Wisconsin file annual report on all 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	Mid-Term EEO review begins for certain radio stations in California , and certain television stations in Illinois and Wisconsin .

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
Emergency antennas, Section 73.1680	June 24
Low Power FM license application, Form 2100, Schedule 319	June 30
Children's television programming, Section 73.671	June 30
Public information about children's television programming, Section 73.673	June 30
Children's Television Programming Report, Form 2100, Schedule H	July 7
FM broadcast license application, Form 2100, Schedule 302-FM	July 7

Cut-Off Date for AM and FM Applications to Change Community of License

The FCC has accepted for filing the applications identified below proposing to change the community of license for each station. These applications may also include proposals to modify technical facilities. The deadline for filing comments about any of the applications in the list below is **June 20, 2025**. Informal objections may be filed any time prior to grant of the application.

PRESENT COMMUNITY	PROPOSED COMMUNITY	STATION	CHANNEL	FREQUENCY
McNary, AZ	Wagon Wheel, AZ	KRXD	249	97.7
Willcox, AZ	Catalina, AZ	KAZK	209	89.7
Swainsboro, GA	Henderson, GA	WXRS (AM)	N/A	1590
Orange-Athol, MA	Paxton, MA	WQVD (AM)	N/A	700
Elizabethville, PA	Carroll Township, PA	WQBG	263	100.5
Sunbury, PA	Elizabethville, PA	WQRX	231	94.1
Junction, TX	Cherry Spring, TX	KCRQ	277	103.3



DEADLINES TO WATCH



Deadlines for Comments in FCC and Other Proceedings

DOCKET

COMMENTS REPLY COMMENTS

(All proceedings are before the FCC unless otherwise noted.)

Docket 25-168; Public Notice (DA 25-382) Petition re permissive 5G broadcast transmission standard for LPTV		July 1
Docket 25-190; NPRM (FCC 25-30) FY 2025 Regulatory Fees	July 7	July 21
Docket 25-165; Public Notice (DA 25-376) Dormant proceedings	July 9	July 24
Docket 25-149; NPRM (FCC 25-26) Foreign ownership policies	FR+30	FR+60
Docket 25-166; NPRM (FCC 25-28) Transparency in foreign adversary ownership	FR+30	FR+60

FR+N means that the filing deadline is N days after publication of notice of the proceeding in the Federal Register.

DIRS Exercise Set for June 16-18 continued from page 1

and assessments concerning communications reliability during disasters.

On June 16, the FCC will send a mock activation letter to all registered participants. The Bureau explains that the letter will clearly state that this is a voluntary exercise and not a real DIRS activation. The letter will list a group of preselected counties that will form the faux disaster area for this exercise. Providers will be asked to report data about communications assets in the affected area. Given that this will be only a test exercise, the Commission does not expect to receive information about actual outages. If a provider does not have communications assets in the activation area, it can still participate in the exercise by reporting notional data about the preselected counties. The Commission asks participants to provide their initial data sets by 10:00 a.m.

Eastern Time on June 17, and to file updated reports by 10:00 a.m. Eastern Time on June 18. The Bureau plans to send a deactivation letter by 3:00 p.m. that same day.

The Bureau invites all communications providers to participate in this exercise. Providers can register and find more information about DIRS at <https://dirs.fcc.gov>. Providers that have not accessed the system or that have not previously participated in DIRS reporting are encouraged to sign up and acclimate themselves to the system.

The FCC has mandated DIRS participation in actual disaster events for other communications providers. Participation is presently voluntary for broadcasters, although there is a pending rulemaking proposal to require broadcast stations to participate.

Appeals Court Keeps AP Out of the White House Press Pool continued from page 3

exclusion from a government-created program to otherwise eligible participants solely because of disagreement with the participant's point of view expressed outside of the benefit or program. While the dissent argued that the smaller venues, such as the Oval Office, indeed should be considered nonpublic fora subject to First Amendment protections, it said that the majority's effort to analyze whether such venues were nonpublic fora is beside the point because there is a broader First Amendment principle strongly supportive of AP's claims. Citing precedent, the dissent expounded that at the heart of the First Amendment's Free Speech Clause is the recognition that viewpoint discrimination is uniquely harmful to a free and democratic society. Ideologically driven attempts to suppress a particular point of view are

presumptively unconstitutional. The dissent concluded that AP would succeed at trial and that the preliminary injunction should be sustained.

This decision may be somewhat mooted because of subsequent developments. The day after the District Court's injunction was issued, the White House adopted a policy abolishing seats for wire services in the press pool. Other wire services were excluded as well as AP. The District Court upheld this policy because it was facially neutral. The court credited the White House's declaration that it had not instituted this policy for the purpose of viewpoint discrimination.

The decision is *Associated Press v. Budowich*, 2025 U.S. App. LEXIS 13980.

Foreign Adversary Certification Proposed for All Broadcast Licensees and Applicants *continued from page 1*

Each regulatee, through an officer or other responsible party, would be required to submit a certification that it is or is not owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary (defined below). A regulatee that has such a relationship would then be required to disclose all direct or indirect ownership interests of five percent or greater. In this report, the regulatee would:

(1) identify its five percent or greater direct or indirect equity and/or voting interest holders as follows:

(a) for each natural person interest holder with a five percent or greater interest, disclose the country of citizenship, including all countries for persons with multiple citizenships;

(b) for each business organization holding a five percent or greater interest, disclose the country under the laws of which it is organized and the country of its principal place of business or headquarters;

(2) identify which foreign adversary owns, controls, or has jurisdiction over the regulatee;

(3) describe the nature of the foreign adversary ownership, control, jurisdiction or direction to which the regulatee is subject.

The Commission proposes to adopt the definition for “foreign adversary” encoded in the Department of Commerce’s rules. Under those rules, the Secretary of Commerce may determine that any foreign government or foreign non-government person is a foreign adversary if they engage a long-term pattern or serious instances of conduct significantly adverse to the national security of the United States or security and safety of United States persons. Such determinations are made with extensive input from national security agencies. The governments and persons about which such a determination has been made are listed in Section 791.4 of the Department of Commerce’s rules (15 CFR 791.4). The list is periodically updated as circumstances change. The current list of identified foreign adversaries includes: China, Cuba, Iran, North Korea, Russia, and the Maduro Regime in Venezuela. The FCC proposes to adopt Section 791.4 as the source for identifying foreign adversaries for purposes of its own new rule. Updates to the list in Section 791.4 would automatically be adopted by the FCC.

The rules would require reporting ownership or control connections with any person owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary. This language tracks the Department of Commerce’s rule in its Section 791.2, which defines such a person as:

(1) Any person, wherever located, who acts as an agent, representative, employee, or any person who acts in any other capacity at the order, request, or under the direction or control, of a foreign adversary or of a person whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in majority part by a foreign adversary;

(2) Any person, wherever located, who is a citizen or resident of a foreign adversary, or a country controlled by a foreign adversary, and is not a United States citizen or permanent resident of the United States;

(3) Any corporation, partnership, association, or other organization with a principal place of business in, headquartered in, incorporated in, or otherwise organized under the laws of a foreign adversary or a country controlled by a foreign adversary; or

(4) Any corporation, partnership, association, or other organization, wherever organized or doing business, that is owned or controlled by a foreign adversary, to include circumstances in which any person identified in paragraphs (1) through (3) above possesses the power, direct or indirect, whether or not exercised, through the ownership of a majority or a dominant minority of the total outstanding voting interest in an entity, board representation, proxy voting, a special share, contractual arrangements, formal or informal arrangements to act in concert, or other means, to determine, direct, or decide important matters affecting an entity.

The FCC has already adopted this same definition in the context of its equipment authorization program. The Commission proposes to interpret “dominant minority” in paragraph (4) above to mean a minimum of 10 percent.

The Commission proposes to use its broadcast attribution rule in Section 73.3555 of its rules to determine what level of interest in a broadcast regulatee held by the person with the foreign adversary relationship would be reportable under the new rule.

Upon compiling information about a regulatee’s connections with a foreign adversary, the Commission asks what action it should take, if any. The options would include further reporting requirements, additional Commission scrutiny, and/or referring the regulatee to the Committee for the Assessment of Foreign Participation in the United States Telecommunications Service Sector to determine whether the regulatee’s holding of an FCC authorization would be a security risk. This Committee, consisting of national security officials, was established by Executive Order in 2020.

The Commission proposes to require initial certifications to be filed within 60 days of the effective date of the new rule, with information collected and accurate as of 30 days prior to the deadline. After that, should certifications be required annually, or only when a regulatee’s status changes, or the list of foreign adversaries is amended? The Commission proposes to require certifications with all applications for new permits and licenses, assignments, transfers of control, modifications, renewals, special temporary authority, and auctions. The Commission asks for comment about what degree of due diligence it should require of a regulatee to determine whether it has a foreign adversary relationship. Should the requirements differ for a regulatee that is a publicly traded company?

continued on page 8

Mostly Lower Regulatory Fees Proposed for FY 2025 continued from page 1

Rulemaking (FCC 25-30) in Docket 25-190. For fiscal year 2024, the Commission determined that 13.12% of the agency's total FTEs were devoted to broadcast regulation, costing \$51,193,000. The agency has performed its calculations for 2025 and proposes to assign 13.14% of all of the agency's FTEs to broadcasting, with a price tag of \$51,286,000. Although these figures show a slight increase for 2025, the specific fees proposed for most individual broadcast authorizations are lower than the corresponding amounts for 2024, which were lower than those for 2023. The accompanying table shows the proposed 2025 fees for most types of authorizations of interest to broadcasters, and compares them to the 2024 fees.

Since 2020, the Commission has inserted an additional element into the formula for determining the fee for full power television stations. Rather than dividing the entire amount of the cost for this category equally among the existing stations, each station's fee is prorated according to the size of the population within its service area. The Commission uses the population figures from the 2020 U.S. Census for the area within the station's noise-limited service contour as indicated by the TVStudy software. For

2025, the Commission proposes a television station fee of \$0.006379 per person residing within the service area. The figure for 2024 was \$0.006598 per person. A table showing the proposed fee for each full power commercial television station in the nation is found in Appendix F attached to the *Notice of Proposed Rulemaking*, available online here: https://docs.fcc.gov/public/attachments/FCC_25_30A1.pdf.

The Commission solicits public comment about how it has allocated the responsibility for regulatory fees across the range of entities that are subject to paying them. Comments are invited only with respect to the specific individual amount and/or allocation of the fees. The overall total amount to be collected by the Commission is mandated by Congress and is not subject to comment. Comments are due by July 7. July 21 is the deadline for reply comments.

When the final figures for fees are adopted, they will be imposed on facilities as per their status and ownership as of October 1, 2024. The Commission typically sets a due date in September for payment of regulatory fees. Government entities and nonprofit entities are exempt from regulatory fees, including for commercial stations that they may own.

REGULATORY FEES FOR FISCAL YEAR 2025

Type of Authorization	FY 2024	Proposed FY 2025
Full Power TV (per person in service area)	\$ 0.006598	\$ 0.006379
Full Power TV Construction Permit	5,200	5,200
Class A TV, LPTV, TV/FM Translator & Booster	245	245
AM Radio Construction Permit	585	560
FM Radio Construction Permit	1,025	980
Satellite Earth Station	2,610	2,840

FY 2024 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
0-10,000	\$ 560	\$ 405	\$ 350	\$ 385	\$ 615	\$ 700
21,001-25,000	935	675	585	645	1,025	1,170
25,001-75,000	1,405	1,015	880	970	1,540	1,755
75,001-150,000	2,105	1,520	1,315	1,450	2,305	2,635
150,001-500,000	3,160	2,280	1,975	2,180	3,465	3,955
500,001-1,200,000	4,730	3,415	2,960	3,265	5,185	5,920
1,200,001-3,000,000	7,105	5,130	4,445	4,900	7,790	8,890
3,000,001-6,000,000	10,650	7,690	6,665	7,345	11,675	13,325
6,000,000+	15,980	11,535	10,000	11,025	17,515	19,995

PROPOSED FY 2025 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
0-10,000	\$ 535	\$ 385	\$ 335	\$ 370	\$ 590	\$ 670
10,001-25,000	895	645	560	615	980	1,120
25,001-75,000	1,345	970	840	925	1,470	1,680
75,001-150,000	2,015	1,450	1,260	1,385	2,205	2,520
150,001-500,000	3,025	2,180	1,895	2,080	3,310	3,785
500,001-1,200,000	4,530	3,265	2,835	3,110	4,960	5,665
1,200,001-3,000,000	6,800	4,900	4,255	4,675	7,450	8,510
3,000,001-6,000,000	10,195	7,345	6,380	7,005	11,160	12,755
6,000,000+	15,295	11,025	9,570	10,510	16,750	19,140

Foreign Adversary Certification Proposed for All Broadcast Licensees and Applicants

continued from page 6

As part of its enforcement effort, the FCC proposes to adopt a streamlined revocation procedure for the authorizations held by regulatees that fail to make proper disclosures. If the Commission believes that it has a reasonable basis for determining that a regulatee has made a false certification of no foreign adversary control, or fails to timely, accurately, or completely respond to the certification and information collection requirements adopted in this proceeding, it would issue a letter to the regulatee notifying it of the Commission's intent to revoke its authorization. The letter would request explanation or correction of any

apparent deficiencies and direct the regulatee to show cause why its authorization should not be revoked within 30 days. The Commission invites suggestions for alternative enforcement methods.

As proposed, these rules would apply to all broadcast licensees and applicants. The Commission has not suggested any exemptions for small entities with limited resources.

Public comment is solicited on all aspects of this proposal. Comments will be due 30 days after notice of this proceeding is published in the Federal Register. The deadline for reply comments will be 60 days after that publication.