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## **Multiple Fees? Pay As You Go!**

*Michael Richards*  
*richard@fhhlaw.com*  
*703-812-0456*

When you go to, say, a grocery store, and you buy a whole bunch of separately packaged items, and you take them to the check-out line, you don't pay for each one separately, do you? Of course not. You roll them all through the scanner, you get a grand total, you pay that grand total, and that's that. While the transaction could perhaps be seen as a series of separate and discrete purchases, in fact it's really just one overall transaction between you and the grocery store.

Why should it be different with the FCC? Beats us, but it does in fact seem to be different.

When an applicant files a number of separately feeable applications or reports, the FCC's system gives the applicant the option of either: (a) paying for each separate application separately, as it gets filed; or (b) paying one lump sum through the Commission's Fee Filer system. The latter is the equivalent of paying the grand total at the grocery check-out line; the former is what you expect the doofus in front of you at the grocery check-out line to do, just to slow things up and inconvenience you personally.

You'd imagine the FCC, as part of a federal government currently looking into the eyes of gaping and growing deficits, might want to make it easy for broadcasters to (a) pay their FCC filing fees, and (b) get fees properly credited so that applications get processed, as bureaucrats say, "in due course." You'd be imagining correctly as to (a), but (b) is another matter entirely.

The problem we have noted is that the FCC's system, and the Commission folks who have to deal with that system, are not always Johnny-on-the-spot about associating lump sum payments with the various applications to which they are supposed to be applied. In fact, in a number of instances it has taken considerable time and effort to get the staff to realize, and acknowledge, that the filing fees have in fact been paid.

Even though the online electronic payment system allows the manual entry of payments for multiple forms and stations, the Commission's system apparently does not always take notice. When that happens, the applications in question sit in some electronic filing

limbo because the system, seemingly unaware of the fact that the filing fee has been paid, does not release the applications to the staff for processing.

The staff, of course, does not normally go rooting through the CDBS holding bin since the staff presumably (and reasonably) figures that the system will send along the pending filings once the fee has been paid. And the applicant, having paid the fee, would not ordinarily be expected to double- and triple-check that all its filings have moved along into the processing queue. The result: puzzling delay leading to lawyers' fees to investigate the delay leading to more lawyers' fees to get the FCC's left hand in touch with the FCC's right hand and thus get things moving.

Although it may be simpler for licensees to pay for a bunch of separate FCC filings with a single online payment, the best way to avoid delays and headaches is to **PAY EACH ONE SEPARATELY** at the time the forms themselves are filed. Both the CDBS broadcast form filing system and the ULS wireless system offer an opportunity to pay for each submission on-line, immediately at the time that submission is made. Our very strong suggestion: take that opportunity!

True, this approach may be cumbersome and counterintuitive – but it sure beats trying to figure out, weeks later, why an application has still not even been accepted for filing despite payment. In Congress, they call this “paygo” – short for pay as you go. Whatever your political bent, if you want to get your applications and forms moving forward as quickly as possible, paygo is the waygo these days!