



A Professional Limited Liability Company  
307 North Michigan Avenue, Suite 1020  
Chicago, Illinois 60601  
Telephone: 312-372-3930  
Facsimile: 312-372-3939

**UPDATE**  
**May 4, 2009**

---

**Increased FCC Filing Fees Effective April 28<sup>th</sup>**

Last September and January we updated you on an FCC Order increasing filing fees. The increased fees were to go into effect 90 days after notification to Congress.

That notification occurred in late January. Accordingly, 90 days later, the FCC announced its new filing fees. For cable operators, the following filing fees are now in effect:

- CARS Licenses, Renewals, Modifications, Assignments, and Transfers of Control - \$260.00.
- Special Temporary Authority - \$170.00.
- Cable Special Relief Petition - \$1,310.00.
- Cable Community Registration (electronic filing) - \$60.00.
- Aeronautical Frequency Usage Notifications (electronic filing) - \$60.00.

If you have any questions about filings at the Commission or filing fees, please call Emily Denney at (312) 372-3930.

**FTC Extends Enforcement Deadline for Red Flags Rules to August 1<sup>st</sup>**

The FTC recently extended the deadline for enforcement of the Red Flags Rules from May 1, 2009 to August 1, 2009.

Under the new regulations, “creditors” are required to establish a written identity theft program. If your company regularly provides services to its subscribers prior to being paid for the services, your company likely falls under the definition of a “creditor” subject to the regulations.

Pursuant to the regulations, creditors must adopt reasonable written policies and procedures to identify for their accounts relevant “Red Flags” (defined as a “pattern, practice or specific activity that indicates the possible existence of identity theft”), detect these Red Flags, respond to any Red Flags to prevent and mitigate identity theft, and ensure that the company’s identity theft program is updated periodically. There are no exceptions to the requirements for small cable operators or other small businesses. That said, the program may be tailored to “the size and complexity of the [company] and the nature and scope of [the company’s] activities.”

If your company has questions about whether these regulations apply to it, or if your company has questions about implementing its identity theft program, please call Heidi Schmid at (312) 372-3930.

---

Please visit our website at [www.cinnamonmueller.com](http://www.cinnamonmueller.com) to learn more about our lawyers and practice. You can reach Cinnamon Mueller at 312-372-3930. *This update is provided by the law firm of Cinnamon Mueller. The document is intended for informational purposes only as a service to clients of Cinnamon Mueller and to the members of the American Cable Association. It is not intended to provide specific legal advice or to substitute obtaining appropriate legal counsel. We encourage you to consult with counsel to address special compliance issues and for assistance in negotiating or handling any such matter referred to in the update.*