Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 74.1231(i) of the Commission’s Rules on FM Broadcast Booster Stations	)	MB Docket No. 20-401
	)	
Modernization of Media Initiative	)	MB Docket No. 17-105
	)	
Amendment of Section 74.1231(i) of the Commission's Rules on FM Broadcast Booster Stations	)	RM-11854
	)	

COMMENTS OF THE
SMALL RADIO BROADCASTER COALITION

February 10, 2021

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COMMENTS OF THE
SMALL RADIO BROADCASTER COALITION

I. INTRODUCTION AND SUMMARY

The Small Radio Broadcaster Coalition ("Coalition")[1] hereby responds to the Federal Communications Commission's ("FCC" or "Commission") Notice of Proposed Rulemaking seeking comment on whether to modify its rules to allow FM broadcasters to air geo-targeted content independent of the signals of their primary stations within different portions of the primary station's protected service contour.[2] Current FCC rules require FM booster stations to operate on the same frequency as the primary station

[1] The Small Radio Broadcaster Coalition is comprised of small to medium sized businesses that own stations located primarily in small markets. The following licensees are members of the Coalition: Bootstrap Broadcasting, LLC, Bryan Broadcasting Corporation, Dana Communications Corporation, Exponent Broadcasting, Inc., First Natchez Radio Group, Inc. d/b/a/ Listen Up Y'all Media, Radio Jones, LLC, Tri-State Communications, Inc. and Withers Broadcasting.

[2] *See Amendment of Section 74.1231(i) of the Commission's Rules on FM Broadcast Booster Stations*, Notice of Proposed Rulemaking, 35 FCC Rcd 14213 (2020) ("NPRM"). The NPRM addresses the Petition for Rulemaking ("Petition") filed by GeoBroadcast Solutions LLC ("GBS").

within the primary station's protected service contour, and they may only rebroadcast the signal of the primary station.[3] GBS asserts that, using its "ZoneCasting" technology, FM booster stations could air different content for limited periods of time within the primary station's protected contour without causing adjacent-channel interference, and that any resulting co-channel interference (or "self-interference") would be manageable and not detrimental to listeners. The NPRM observes that the use of FM booster stations to air geo-targeted content "could potentially help FM broadcasters, including small and independent broadcast stations owned by women, minorities, and small businesses, to provide important and more locally relevant information and to better compete for advertising revenue in an increasingly dynamic media marketplace."[4]

Unfortunately, the Coalition expects the GBS proposal to have the exact opposite result. Nothing in the record gives us any confidence that geotargeting as proposed would improve the technical or program quality of radio service overall, enhance the economic viability of small radio station groups like ours, or enable smaller-market broadcasters to better serve local communities. Indeed, the proposals, if enacted, could potentially lead to a race to the bottom, discouraging broadcast listeners and reducing radio advertising revenues already under very significant pressure from other marketplace competitors. Given the economic slump and sharp decline in the ad market

[3] 47 C.F.R. § 74.1231(i) ("An FM broadcast booster station is authorized to retransmit only the signals of its primary station which have been received directly through space and suitably amplified, or received by alternative signal delivery means including, but not limited to, satellite and terrestrial microwave facilities. The FM booster station shall not retransmit the signals of any other station nor make independent transmissions, except that locally generated signals may be used to excite the booster apparatus for the purpose of conducting tests and measurements essential to the proper installation and maintenance of the apparatus.").

[4] NPRM at ¶ 3.

due to the continuing pandemic, this is in fact the worst possible time to adopt proposals likely to harm free, over-the-air (OTA) radio services both technically and economically. The Coalition also expects that, if implemented, GBS's proposal would exacerbate the already severe competitive problems facing smaller-radio station groups and stations located in mid-sized and small markets. We urge the Commission to refrain from regulatory action that will not aid – and will potentially harm – our continued ability to provide quality local radio service, especially in smaller communities and rural areas more dependent on broadcast radio.

II. GRANT OF THE GBS PETITION WOULD HAVE ADVERSE ECONOMIC AND TECHNICAL CONSEQUENCES FOR RADIO BROADCASTERS AND LISTENERS

A. The GBS Proposal Would Place Downward Pressure on Radio Advertising Rates and Revenues

The GBS Petition rests on the untested assumption that the deployment of ZoneCasting can only help radio industry revenues, thereby improving radio stations' ability to deliver quality local content to their audiences. The Coalition believes this assumption is unfounded and urges the Commission to carefully consider whether the likely economic harms arising from grant of the GBS Petition will undercut any potential benefits. The Coalition anticipates that dividing broadcast signals for the purpose of advertising sales will place downward pricing pressure on advertising rates overall, further reducing radio advertising revenue and harming the viability of local FM radio service for the listening public.

Viewed through the rose-colored lenses of the GBS Petition, geo-targeted advertising poses no risk of harm to radio advertising revenues, and merely creates an overlay of new potential customers and new revenue opportunities.[5] That would be wonderful if not so fantastical. Most importantly, GBS's assumptions here are unwarranted. First, GBS (and, to an extent, the NPRM) are assuming that radio broadcasters (i) would be able to sell greater numbers of ads than they do today in an intensely competitive marketplace with myriad other options for advertisers, including an array of online and mobile ads, and (ii) could sell enough of these lower-priced geo-targeted ads to earn revenue sufficient to justify the stations' time and effort and the potential expense of purchasing and maintaining new transmission equipment.[6] The Coalition doubts the validity of those assumptions.

Second, GBS entirely fails to consider the likely, if unintended, consequences of its proposal. Currently, radio stations sell advertising across their entire over-the-air coverage areas, and advertising rates are based on stations' ability to attract listeners across their entire local markets.[7] That is our advantage. If the Commission authorizes the geotargeted selling of ads using FM boosters, there would be adverse effects on

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[5] GBS Petition at 18 (ZoneCasting would "give radio the option of exploring new revenue streams by attracting new advertisers for whom it previously would not have made economic sense to purchase advertising for an entire community of license.").

[6] While there is some suggestion in the record that GBS plans on subsidizing booster buildout, the Commission does not suggest it would require it, and thus that offer could change at any time. But even if GBS does provide some financing for stations' booster buildout, that would not fully address small broadcasters' concerns about the burdens associated with implementing geotargeting. *See* Section III, *infra*.

[7] Competition in the advertising marketplace is fierce and flourishing, with numerous options for advertisers across both traditional and digital outlets. Current radio ad rates are certainly not supracompetitive. Indeed, radio station ad revenues have declined substantially over time and remain below the levels reached prior to the recession of 2008-2009. *See 2020 Communications Marketplace Report,* at ¶ 249, GN Docket No. 20-60, FCC 20-188 (Dec. 31, 2020); Section III*, infra.* There is no need for the FCC to seek to reduce radio advertising rates by adopting GBS's proposals.

stations (including those choosing not to geotarget ads), and perhaps on consumers as well, assuming that even a few stations in any local market began selling geo-targeted ads. Certain advertisers in that local market would come to expect the option of paying to reach only smaller, pre-selected geographic segments of the market at lower rates. Advertisers could much more easily choose to ignore particular sub-markets or even neighborhoods within the larger market, thereby disadvantaging smaller stations serving those areas and the listeners residing there. Stations in the market that had preferred to opt out of geotargeting because of the expense to launch ZoneCasting or interference concerns with the technology, could be forced to reconsider that decision or else lose advertisers wanting the ability to slice and dice stations' coverage areas into the favored portions they will pay to reach and those they will not.

For these reasons, the Coalition believes that dividing broadcast signals for the convenience of advertisers is likely to place significant downward pressure on radio advertising rates and, ultimately, on stations' vital advertising revenues. While the FCC's adoption of GBS's proposal would likely financially benefit that one company, it will not benefit advertising-dependent local radio stations needing the economic wherewithal to provide their communities with quality music, news and sports programming and emergency information. The Commission should decline to make regulatory changes highly unlikely to economically benefit local stations, more likely to lead to economic harm for many stations, and with unknown potential, as discussed below, to lower the technical quality of FM service.

B. The GBS Petition Raises Technical Concerns that Warrant Further Study Before Any Rule Changes Are Made

As some commenters have observed, there has been very little real-world testing of GBS's proposed ZoneCasting technology. Given the technical issues raised by the proposal and their potential secondary effects, the Coalition believes there should be significantly more testing of GBS technology if the Commission is considering amending its FM booster rules as proposed in the Petition.[8]

First, the Petition identifies only three stations that tested GBS's ZoneCasting technology, and only one of those appears to have involved mobile testing.[9] Commenters also observe that only one station's testing involved the current generation of ZoneCasting technology.[10] Such limited testing is inadequate and cannot form the basis for a rational conclusion about the reliability of the GBS technology or its potential harms to the FM band. The Commission would be able to make a better-informed decision, with the benefit of more meaningful public comment, if additional real-world data were available about potential inference resulting from the proposed rule changes. On many occasions, including in its 2020 Communications Marketplace Report (at ¶ 253), the Commission has noted the persistent interference issues with AM, which likely resulted in the significant reduction of music programming on AM stations. The Coalition

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[8] Letter to Marlene H. Dortch, FCC Secretary from Beasley Media Group, LLC, Cumulus Media Inc., Entercom Communications Corp., and iHeartCommunications, Inc., RM-11854 (May 4, 2020) (Broadcaster Joint Comments).

[9] Petition at Exhibit C, ¶¶ 11-13.

[10] *See* Broadcaster Joint Comments at 1-2 (two of the three tests involved earlier versions of ZoneCasting, so there has been "only one real-world experimental test (Milwaukee) of the current generation of [GBS's] ZoneCasting technology").

urges the FCC to proceed with the utmost caution in approving any regulatory changes with the potential to increase interference in the FM band.

Even assuming that GBS is correct and its system would result in no interference to other broadcasters, the Petition concedes that listeners will experience disruptions in programming, or “self-interference,” as the booster signal is handed off from the primary programming to the geotargeted content.[11] As other commenters have observed, this technical challenge may “generate[s] significant listener confusion as they cross transition zones.”[12] Such confusion can undermine listeners’ confidence not only in the particular station they are listening to, but in over-the-air radio generally. With a plethora of other audio options available, any negative radio listening experiences could drive audiences to other non-broadcast options. GBS suggests that interference issues will be resolved on their own because use of the GBS system would be voluntary.[13] However, individual broadcasters may differ about how much self-interference is too much, and a shift in audience perception about the reliability and quality of some stations can easily affect how the entire FM radio industry is perceived.

Significantly, disruptions in radio service from self-interference are more likely to occur when listeners are driving. Given the large proportion of radio listening that occurs in automobiles,[14] the Coalition is concerned about interference in the mobile environment, especially given the dearth of mobile testing. Undercutting radio’s

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[11] Broadcaster Joint Comments at 1 (citing Petition at Exhibit C at 6-7, ¶¶ 12-13). *See also* NPRM at ¶ 13.

[12] Broadcaster Joint Comments at 1.

[13] Petition at 9-10.

[14] According to Edison Research’s “Share of Ear” data, in-car listening represented about 44 percent of all AM/FM listening in 2020.

reliability or quality, especially during drive time, could even affect radio's continued presence in cars, which is essential to the long-term viability of radio service. With a growing array of technologies competing for space on auto dashboards,[15] radio stations must remain highly desired by audiences for radio receivers to keep their place on the dash.[16]

Given the technical issues raised by the Petition and their potential impacts on audience perception of the reliability and quality of radio service, the Coalition urges the Commission to gather significantly more data on GBS's proposed technology, especially in the mobile environment, if it seeks to move forward. Only with the benefit of a more complete record on the likelihood of interference and the potential impact of disruptions in radio service can the Commission make an informed decision on the technical aspects of the requested rule changes.

III. GEOTARGETING PROPSALS POSE PARTICULAR PERIL FOR SMALL RADIO BROADCASTERS AND STATIONS LOCATED IN SMALLER MARKETS

In light of the discussion above, the Coalition disagrees with claims that the proposed rule changes would generate additional economic opportunity for broadcasters, attract listeners and promote localism.[17] Indeed, if implemented, geotargeting likely will only exacerbate the already severe economic and competitive

[15] *See*, *e.g*., Anna Washenko, *Amazon expands in-car footprint for Alexa*, *Fire TV*, *and Echo Auto*, Radio & Internet News (Jan. 6, 2020).

[16] *See*, *e.g*., Roger Lanctot, Strategy Analytics, Infotainment & Telematics blog, strategyanalytics.com (Apr. 16, 2020) ("Car makers have chosen to keep radios in cars for the most part based on consumer preferences. But there is no guarantee that the radio dial in the dash will endure.").

[17] *See* NPRM at ¶¶ 27-28.

challenges facing small radio station groups and stations in mid-sized and small markets and impede, not enhance, these broadcasters' ability to serve their local markets effectively.

A. Radio Stations Located in Certain Areas Outside Urban Cores May Be Particularly Harmed

As an initial matter, the Coalition observes that, if any radio broadcasters would have hopes of earning a reasonable return on geotargeting, it would be large groups. The largest station groups could utilize geotargeting at scale across multiple markets and would have the resources to hire any necessary additional employees, including sales staff,[18] and easily pay for the transmission equipment.[19] And if some large broadcast groups with stations located in urban cores chose to use boosters to geotarget ads, stations located in smaller communities around those urban centers would likely suffer particular economic harm.

Specifically, stations in populous urban centers with powerful signals covering the entire urban core could use boosters to better reach surrounding areas closer to the edges of their service contours and offer geotargeted ads in those areas. This would effectively cut into the advertising revenues of stations located in smaller communities

[18] Additional sales personnel could be needed to try to find significant numbers of new niche or small advertisers interested in narrowly geotargeted ads.

[19] While the NPRM (at ¶ 30 and note 52) suggests that vendor financing of the transmission equipment may be feasible, that is certainly no guarantee and this possibility does not make geotargeting attractive for small broadcasters. Even if the vendor agreed to help finance the initial purchase of the necessary equipment, a small broadcaster would still need to repay that initial financing, presumably out of the additional revenues it might – or might not – receive from geotargeted ads. If those additional revenues do not materialize in sufficient amounts, then a small broadcaster would end up owing money to the vendor it could struggle to repay (which would become even more difficult if offering lower priced geotargeted ads placed downward pressure on the station's overall ad rates).

and areas near those urban centers whose service contours do not cover most, or much at all, of the urban core and which therefore depend heavily on ad revenues derived from these surrounding areas. Such stations would have their ad revenues depleted by urban center stations using boosters to sell targeted ads outside the urban core at lower rates than the stations located in those exurban areas could survive on. Rather than increasing economic opportunity for stations, the use of geotargeted ads in these circumstances clearly would pose a threat to the financial viability of stations located on the outskirts of urban centers and in surrounding areas.

B. Stations Located in Smaller Markets and Small Radio Groups Will Be Those Most Hurt by Downward Pressure Put on Advertising Rates by Geotargeting

Any marketplace or regulatory developments placing downward pressure on advertising rates and revenues will harm radio stations located in mid-sized and small markets and smaller station groups to an even greater degree than other audio market participants. As documented in other FCC proceedings, the radio industry as a whole has struggled to compete for advertising dollars against other outlets, especially the large digital ad platforms, and smaller market radio stations have experienced particular difficulties earning adequate advertising revenues. The coronavirus pandemic, moreover, has caused a tremendous decline in the radio advertising market. As described in detail below, now is definitely not the time to take any regulatory actions, including the ones proposed in the NPRM, with the potential to drive down radio stations' advertising revenues. Rather than promoting localism, such regulatory actions would run the risk of harming local stations' services to their communities, particularly in small markets and rural areas most reliant on broadcast radio stations.

Both the Commission and broadcasters have documented in detail the significant declines in the radio industry's advertising revenues over time.[20] The FCC's 2020 Communications Marketplace Report recently reconfirmed that "advertising revenue in the radio industry never fully recovered from the decline in advertising experienced during the recession following the 2008 financial crisis."[21]

The long-term slowdown in the advertising marketplace following the 2008-2009 recession coincided with the digital disruption of the audio services and advertising markets. As broadcasters and analysts have shown, advertisers have shifted, and continue to shift, their dollars toward online and mobile outlets, and radio stations face intense and growing competition from digital competitors for both ad revenues and audiences.[22] Many radio broadcasters, including small station groups and those located in smaller markets, have previously described in detail the substantial advertising spending they have lost to digital outlets in their specific local markets across the country.[23]

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[20] *See*, *e.g*., 2020 Communications Marketplace Report at ¶¶ 249-50 & Fig. II.E.3 (documenting decline in radio ad revenues from 2004 to 2020); BIA Advisory Services, *Local Radio Station Viability in the New Media Marketplace*, at 10-11 & Fig. 7 (Apr. 19, 2019) (BIA Local Radio Station Report), Attachment A to Comments of Nat'l Ass'n of Broadcasters, MB Docket 18-349 (Apr. 29, 2019) (showing a 25 percent decline in radio stations' over-the-air ad revenues from mid-2000s through 2018, even without accounting for inflation).

[21] 2020 Communications Marketplace Report at ¶ 249.

[22] *See*, *e.g*., Derek Baine, *Advertising market growth unable to keep up with GDP*, Kagan Market Intelligence (2019); Joint Reply Comments of Broadcast Licensees, MB Docket No. 18-349 (May 29, 2019); Joint Comments of Connoisseur Media, LLC, *et al*., MB Docket No. 18-349 (Apr. 29, 2019) (Comments of Ten Radio Broadcasters).

[23] *See*, *e.g*., Comments of Ten Radio Broadcasters at Exhibit C (providing declarations from smaller broadcasters detailing specific advertisers and/or amounts of advertising lost to digital competitors in mid-sized and small markets in many states, including

The coronavirus pandemic's shock to the advertising market has only exacerbated radio stations' struggles to earn revenues sufficient to maintain their local services. The FCC recently cited S&P Global projections that total broadcast radio revenue for 2020 will decline 15.2 percent from 2019, and also noted that radio advertising following the pandemic will have a tougher road to recovery than TV advertising.[24] Given the considerable contraction in radio ad revenues caused by the pandemic, numerous radio broadcasters, including many small ones and those in smaller markets, have been forced to layoff employees or even go silent, thereby directly impacting the public's free, over-the-air radio services.[25]

Nebraska, Kansas, Washington, Colorado, Idaho, Utah, Indiana, Michigan, Minnesota, North Dakota, South Dakota, Tennessee, Wisconsin, Illinois and Wyoming).

[24] 2020 Communications Marketplace Report at ¶ 249 and Fig. II.E.3. Other analysts have estimated even larger declines in radio industry revenue from 2019 to 2020 and projected that the 2020 radio ad decline will not be fully or quickly reversed. *See*, *e.g*., Ross Benes, *Radio Ad Spending Will Decline by 25% This Year*, eMarketer (Sept. 16, 2020) Group M, *This Year Next Year*: *U.S*. *End-of-Year Forecast*, at 12 (Dec. 2020); Justin Nielson, *Radio/TV station annual outlook*, S&P Global (Aug. 4, 2020).

[25] *See*, *e.g*., *Tough Times for Local Radio*, The Laurel Connecticut (July 23, 2020) (reporting that Hall Communications, the owner of a half-dozen radio stations in eastern Connecticut, laid off two reporters and two on-air employees due to COVID-19); Adam Jacobson, *Gleason Stations Prepare for Sign-Offs in Maine*, rbr.com (Mar. 25, 2020) (reporting that five stations in small markets in Maine were going silent); Inside Radio, *Coronavirus Poses New Risk To AM Radio* (Apr. 14, 2020) (recounting AM and FM stations going off the air in Idaho, Hawaii, Oregon and North Carolina); RAMP, *Forever Media Cuts Up To 15 Employees* (Mar. 27, 2020) (recounting pandemic-related reductions in force at stations in Wilmington and Milford, DE and Havre de Grace, MD); RAMP, *Downsizing Hits American General Media* (Mar. 31, 2020) (reporting on salaries cut and numerous employees downsized in the company's stations in Bakersfield, Santa Maria and San Luis Obispo, CA; Durango and Cortez, CO; and Albuquerque and Farmington, NM); Inside Radio, *April Saw A Big Spike In Stations Going Silent*. *Many Cited Coronavirus As The Culprit* (Apr. 29, 2020) (reporting numerous radio stations going dark, including regional Mexican and ethnic stations in Seattle-Tacoma and Portland): RAMP, *Staff Furloughs at Meruelo Media* (Mar. 24, 2020) (reporting furloughs at Los Angeles radio station owned by a leading minority-owned media group).

The longer-term and pandemic-related declines in the advertising market present particular threats to the continued viability of smaller radio groups with lesser resources and radio stations located in markets with smaller populations and advertising bases. BIA has shown that radio stations in mid-sized and small markets generate only a fraction of the ad revenues gained by stations in the largest markets.[26] As a result, many stations in these markets experience difficulties earning ad revenues sufficient to cover their substantial fixed operating costs, let alone to invest in improving their stations' programming, upgrading their technical facilities or hiring additional staff.[27] Numerous smaller-sized radio broadcasters previously have attested to the challenging competitive landscape in their local markets and their difficulties generating adequate advertising revenues, obtaining financing, hiring talented staff and providing strong programming.[28]

In light of the well-documented economic challenges facing radio broadcasters, the Coalition urges the Commission to decline to authorize the current geotargeting

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[26] BIA Local Radio Station Report at 14. In 2018, the average station in Nielsen radio markets 201-265 earned only 7.1 percent of the amount of revenue earned by the average station in the top-10 radio markets. The average station in markets 151-200 earned only 10.5 percent of the average top-10 station; in markets 101-150, 11.7 percent; and in markets 76-100, 13.4 percent.

[27] BIA Local Radio Station Report at 31-33.

[28] *See*, *e.g*., Comments of Dick Broadcasting Co., Inc., MB Docket 18-349, at 1-2 (Apr. 9, 2019); Decl. of Susan Patrick, Legend Communications of WY, LLC at 2, Exh. C, attached to Comments of Ten Radio Broadcasters; Comments of Radio Fargo-Moorhead, Inc., MB Docket No. 18-349, at 2-4 (Sept. 11, 2019); Reply Comments of Grant Co. Broadcasters, MB Docket No. 18-349, at 1-2 (May 13, 2019); Written *Ex Parte* of Zimmer Radio & Marketing Group, MB Docket No. 18-349, at 1-2 (Aug. 1, 2019); Reply Comments of WBOC, Inc., MB Docket No. 18-349, at 1-3 (May 29, 2019); Letter from Aaron J. Leiker, President/General Manager, 25-7 Media, to FCC, MB Docket No. 18-349 (Apr. 30, 2019).

proposals, which run a clear risk of placing additional downward pressure on stations' advertising rates and revenues. Such an outcome would impair local stations' ability to continue providing, let alone improving, service to their communities and therefore would be directly contrary to the FCC's localism goals. The Coalition is especially concerned about maintaining viable service to small communities and in rural areas more dependent on broadcast radio, due to the relative lack of other local media outlets.[29] We do not believe the proposals outlined in the NPRM will benefit small broadcasters and stations located in smaller markets or aid their provision of vital services.

IV. CONCLUSION

The Coalition urges the Commission to "first, do no harm." We very much doubt that small radio broadcasters will benefit from adoption of the NPRM's proposals, and believe it much more likely to harm – both financially and technically – the radio industry's free, over-the-air services. While the FCC should not move forward in this proceeding, the Coalition urges the Commission to consider other measures to help ensure the future viability of FM and AM radio services.

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[29] *See*, *e.g*., Melissa Etehad, *Nevada town lacked coronavirus news. A radio station came to the rescue*, Los Angeles Times (Apr. 14, 2020) (describing the daily pandemic updates given by a very small radio station in Ely, Nevada, a remote town lacking a local TV station, a daily newspaper or consistent internet access); Inside Radio, *California Wildfires Leave One Familiar Lifeline*: *Radio* (Oct. 11, 2017) (during massive wildfires, residents in rural area depended on two radio stations for emergency information and briefings by public officials in an area without local TV stations); Radio Ink, *Association Chair Asks For Fee Break* (May 21, 2020) (head of Colorado Broadcasters Association stating in a letter to FCC Chairman Pai that its members, many of which serve rural areas and geographically dispersed communities highly dependent on radio, were losing up to 75 percent of their second quarter income due to the pandemic and shutdown).

Respectfully submitted,

SMALL RADIO BROADCASTER COALITION

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