

April 10, 2020

Honorable Ajit Pai  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

*Re: RM-11854* Amendment of Section 74.1231 (i) Solutions, LLC of the Commission's Rules on FM Broadcast Booster Stations

Dear Chairman Pai:

Your office has recently received a petition seeking a rule change that would permit radio broadcasters to use geo-targeted programming over-the-air. I am writing you in support of the technology, one version of which is called ZoneCasting and has been developed and submitted by GeoBroadcast Solutions LLC, a Chicago-based company. I have studied this application and it presents many interesting public safety and business opportunities while not raising any significant engineering concerns after vetting by top technology executives in the industry. In fact, this technology is already commercially deployed fulltime in France.

In this era of hyper-local and targeted communications, radio has become the lone medium unable to reach its listeners on a granular basis. And, in fact, the value of geo-targeting through radio in times of local, regional, state, and federal emergencies is a paramount personal concern of mine.

As the administrator of the Federal Emergency Management Agency from 2009 to 2017 I have witnessed first-hand that our oldest form of broadcast, radio, remains the most reliable, stable form of communicating, yet lacks the ability to target specific communities within its larger signal. Radio has literally weathered all forms of disasters – be it California wildfires, where 200 cellular towers were destroyed, hurricanes like Sandy and Katrina, which overloaded most forms of communications, or coastal floods in Florida. Furthermore, radios are always accessible because they can run on batteries and people have them, in their car if nowhere else.

Without a doubt, localized radio broadcast updates of today's COVID-19 crisis would serve the public good by communicating public safety information pertinent to specific portions of the airwave's audience. Consider the benefit of reaching a 25-mile portion of a radio signal about local test sites or shelters versus informing that same station's 100-mile audience that do not need those specifics but require their own, zoned, details.

We're weeks away from the 2020 Hurricane Season, and all indications are that it will be an active one. With a rule change to allow FM booster stations to offer zoned broadcasting, a series of geozones could be established along the East Coast that would allow radio broadcasters to target information to specific geo-fenced areas with different messages. For example, in Florida the messaging for coastal communities can be different than from inland communities. Today, radio stations can only share one message to everyone.

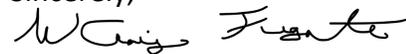
The radio industry has also fallen on hard times in recent years, and the pandemic has hit broadcasters hard. Radio needs something new to help it rebuild post-COVID-19. Radio needs to produce new revenue streams with a new type of service. Radio's advertising revenue has dropped so far so fast. Radio needs a plan to be innovative, adaptable for the industry to have long-term viability. Zoned broadcasting helps with a new start by offering something different that is valued by public safety, listeners, advertisers and listeners.

A study by BIA Advisory Services shows that the ability to geo-target ads will jump-start radio's revenue from its current projected decline. The advertisers I speak to are increasingly interested in making geo-targeted buys, and that interest is only expected to increase. I am also excited by this technology because it can include hyper-localized weather, news, alternate language programming, and emergency alerts. It is not surprising that another study in the record shows that consumers would prefer to listen to more localized content, including more localized advertisements, and this technology will give broadcasters the tools *if they want to use them* to offer that service. New research also shows that all types of advertisers – national, regional, and local business are interested in the ability for local radio stations to provide zoned advertising.

Geotargeted technology for radio relies on single frequency network (SFN) that will allow stations to offer regionalized programming, alerts and warnings, local traffic and weather and local advertisements. We will all benefit by changing the FM booster rules to allow radio to more adaptable to changing needs in the marketplace and in our society.

With the aforementioned combined information, I urge you and the Commission to take immediate actions to *allow* radio broadcasters to introduce this innovative new technology that can benefit radio listeners, public service agencies, local businesses, advertisers and broadcasters.

Sincerely,



Craig Fugate

Cc: Michael O'Rielly, Commissioner  
Brendan Carr, Commissioner  
Jessica Rosenworcel, Commissioner  
Geoffrey Starks, Commissioner