

EDUCATIONAL MEDIA FOUNDATION
5700 WEST OAKS BOULEVARD
ROCKLIN, CA 95765

May 4, 2020

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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

Dear Ms. Dortch:

Educational Media Foundation supports the petition of GeoBroadcast Solutions, LLC ("GeoBroadcast") to amend the FM booster rules to allow FM stations, on an opt-in basis, to allow the inclusion of limited amounts of programming on boosters different from the programming carried on the primary station. This would allow FM stations to hyper-target audiences in their marketplace.

EMF operates hundreds of FM stations across the country. It has recently begun to deploy the MaxxCasting™ system similar to that utilized in the GeoBroadcast proposal to maximize service from some of its FM stations by using boosters to resolve terrain issues. In the past, the use of boosters to resolve terrain issues could be a concern in all but the most terrain-shielded areas because of the potential of boosters to interfere with the signal of the primary station. The MaxxCasting technology has significantly reduced the interference between the booster and the primary station, making the use of boosters far more practical for the resolution of this type of signal issue. EMF sees no reason that the GeoBroadcast system would not be able to similarly be utilized to hyper-target audiences within particular service areas of an FM station.

While EMF may not be the first company that will employ the new technology, it believes providing the option to FM broadcasters will strengthen many stations that are struggling to compete with other media outlets who are able to geographically target specific segments of it audience. A strong FM industry benefits all broadcasters – even noncommercial operators like EMF.

Additionally, as the technology develops, EMF could see how it could be used to relay emergency information and community service messages to audiences to whom they most directly pertain in the areas in which listeners live or work. As the technology is further deployed, this could be an advantage to all broadcasters, including EMF.

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Thus, EMF asks that the Commission further consider the GeoBroadcast petition and advance the proposal to a Notice of Proposed Rulemaking for more formal comments from the industry.

Respectfully Submitted,

EDUCATIONAL MEDIA FOUNDATION

By: _____/s/
Sam Wallington
Vice President of Ops and Engineering