

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

In the Matter of)	
)	
Electronic Delivery of MVPD Communications)	MB Docket No. 17-317
)	
Modernization of Media Regulation Initiative)	MB Docket No. 17-105
)	
)	

**COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

The National Association of Broadcasters (NAB)¹ hereby comments on the Further Notice of Proposed Rulemaking in the above-captioned proceedings.² In the FNPRM, the Commission seeks comment on applying its modernized carriage election rules to low power television (LPTV) stations that qualify for mandatory carriage and multichannel video programming distributors (MVPDs) that do not have a presence in the FCC's Online Public Inspection File (OPIF) database or its Cable Operations and Licensing System (COALS) (together, the Excluded Entities).³ NAB does not object to a requirement that Excluded Entities establish and publicize an email address and phone number to use for carriage-related communications.⁴ NAB urges only that the requirement adopted apply equally to

¹ The National Association of Broadcasters (NAB) is a nonprofit association that advocates on behalf of local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² Electronic Delivery of MVPD Communications, MB Docket No. 17-317, FCC No. 19-69 (July 11, 2019) (FNPRM).

³ FNPRM at ¶¶ 29-30. The Commission notes that low power television (LPTV) stations that are qualified to elect mandatory carriage are not required to maintain an OPIF and that open video systems (OVS) operators are not required to maintain an OPIF or use COALS. FNPRM at n. 117.

⁴ To publicize this carriage-related contact information, Excluded Entities could be required to provide the information to the FCC, post the information directly to an FCC-hosted site or

both LPTV stations that qualify for mandatory carriage and MVPDs that do not maintain a presence in OPIF or COALS.⁵

Respectfully submitted,

**NATIONAL ASSOCIATION OF
BROADCASTERS**

1771 N Street, NW
Washington, DC 20036
(202) 429-5430



Rick Kaplan
Erin Dozier

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establish a very narrow online public file solely to post the contact information. See FNPRM at ¶ 30.

⁵ See *a/so* Reply Comments of NAB, MB Docket No. 19-165 (Sept. 19, 2019) (stating that if the Commission requires certain LPTV stations to post contact information on an FCC-hosted site for purposes of receiving certain notifications from MVPDs, it should adopt a similar requirement for MVPDs that do not use OPIF or COALS in the carriage election context).