

June 6, 2006

The Honorable Michael J. Copps  
Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**Re: Carriage of Broadcasters' Multicast Channels, CS Docket No. 98-120**

Dear Commissioner Copps:

I am writing to ask that you support public interest efforts by broadcasters through your support of must carry for all free over-the air broadcast channels on cable.

Ensuring carriage for the full digital broadcast signal, including all multicast channels, will yield a tangible result – local broadcasters will be able to invest in multicast channels and secure broadcasting's future in a digital and increasingly competitive video marketplace. Your vote of support for full carriage will further your stated goal of promoting localism, diversity and the public interest in the digital age.

In your concurring statement to the Commission's *Second Report and Order* in CS Docket No. 98-120, you recognized the potential of digital broadcasting to offer more local coverage on multicast channels. Many broadcasters are working to fulfill that potential. We have developed specialized channels such as local news, weather and community channels. For example, the Hive, from Clear Channel Television, is an all-local multicast channel that derives its content in part from colleges, high schools and community organizations.

Broadcasters are eager to serve their local communities by making their multicast channels viable, while fulfilling the FCC's public interest goals. But to do so, we must be able to reach all of our viewers, including those who only receive broadcast signals through cable. In a July 2005 survey conducted by NAB, 79.2% of stations that are presently multicasting or planning to do so stated they will be highly unlikely or unlikely to provide these types of services in the future if these stations were not carried by their local cable systems.

You have stated your strong support for children's programming in the digital television era. In supporting the 2004 Children's Television rules, you stated that the Commission took "important initial steps towards making sure we and our kids harvest the full benefits of digital television." In a world of multicast carriage, there will be more children's programming choices. Additionally, broadcasters such as Ion Media Network, are devoting entire multicast channels to providing around-the-clock quality children's digital television programming.

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On April 24, NAB lent its support to a *Joint Proposal* submitted by various broadcast and cable industry representatives and children's television public interest groups recommending modifications to the Commission's *2004 Report & Order*, which imposed a three-hour per channel educational and informational programming processing guideline. NAB urged the Commission to adopt the *Joint Proposal*, as we believe it to be a sensible response and compromise to the *2004 Order* that best serves the public interest. Harvesting these benefits will only happen if broadcasters are able to make multicasting a reality. Should the Commission refuse to require full digital carriage, including multicast channels, cable viewers will be denied access to children's educational and informational programming on each multicast channel that is not carried.

NAB recognizes your concern that public interest obligations for digital television have not been fully defined. We look forward to working with you and the Commission in the ongoing proceedings. We share the same policy goal of serving the public interest. Everyday local broadcasters serve their local communities, and the over 600 multicast channels currently deployed in the marketplace are a testament to this commitment. To ensure the viability and continued growth of local, informative, educational, and diverse programming, your support of multicast must carry is critical.

The upcoming vote before the Commission will determine whether there will be more or less public interest programming. A yes vote in favor of multicast must carry carriage requirements will help achieve your vision of serving the public.

Please do not hesitate to contact me if we can provide you with additional information or if you have additional questions about how broadcasters will ensure multicast must carry will serve America.

Best wishes.

Sincerely,



David K. Rehr

cc: The Honorable Kevin J. Martin, Chairman  
The Honorable Jonathan S. Adelstein, Commissioner  
The Honorable Deborah Taylor Tate, Commissioner  
The Honorable Robert M. McDowell, Commissioner