



January 6, 2009

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: MB 08-255

Dear Ms. Dortch:

Today, Jane E. Mago, and the undersigned of the National Association of Broadcasters (NAB), along with David Donovan, Association for Maximum Service Television, Inc., (MSTV), met with Rosemary Harold of the Office of Commissioner McDowell. As discussed in our joint filing, broadcasters recognize that it is our nation's best interest to have a comprehensive plan to answer viewer questions that arise at the time of the digital television (DTV) transition, one that includes contingencies for persons that may not have taken the necessary steps to be prepared by February 17, 2009.

Thus, we recommend the Commission (1) expand stations' eligibility beyond current Appendix A to ensure the maximum number of Americans can receive the "Analog Nightlight" program with minimum disruption to DTV reception and (2) streamline the application process to ensure maximum broadcaster participation in the voluntary program, including implementing an email address solution for stations that are on a pre-approved list.

Moreover, a flexible regulatory approach may also maximize station participation, especially if stations can underwrite through sponsorships the costs of maintaining the "Analog Nightlight" program, have the flexibility to remain on the air up to thirty (30) days after the transition and are able to broadcast a variety of contact information for their viewers.

Finally, we offer a correction to page three of our January 5 comments. In light of the comments filed by the Named State Broadcasters, the number of State Associations that have been able to set up phone banks was overestimated. To date, there are

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approximately 13 statewide call centers sponsored by individual State Associations, with 18 more in the planning/development stage, and six more under consideration.

Please direct any questions to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, consisting of a stylized 'A' followed by the name 'Bobeck'.

Ann West Bobeck
Associate General Counsel
Legal and Regulatory Affairs

cc: Rosemary Harold