

Mr. Blair Levin  
Executive Director, Omnibus Broadband Initiative  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

January 15, 2010

Re: A National Broadband Plan for Our Future, GN Docket No. 09-51

Dear Mr. Levin:

I want to correct and elaborate on my letter to you of December 29, 2009.<sup>1</sup> One of the main points in that letter was that public media entities could do much more to support broadband content and information services if resources were reallocated from broadcast distribution to other applications. The numbers I included for average station master control operation – one component of broadcast distribution expenses – were off. What I cited as daily expenses (\$11,384 - \$72,247) were actually much closer to the range of *monthly* expenses for master control.<sup>2</sup> The point remains, however, that an entity could support more than one full time reporter even at the low end of that range (provided that alternative incremental broadband distribution costs were relatively low).

The second point is that master control operation turns out to be a sub-optimal proxy for broadcast infrastructure expenditures. The “content distribution and delivery” line item comes much closer. As I noted in my letter, these expenses (of which broadcast expenses are the largest part) are about the same as what stations spend on programming. The Corporation for Public Broadcasting has given me corrected numbers based on its FY 2008 Station Activities Benchmarking Survey. Content distribution and delivery expenses are 16.2% for large licensees (many of which operate multiple stations) to 18.6% for small licensees. This amounts to \$2.9 million-\$27.3 million in annual expenditures per licensee on broadcast delivery of content.

These numbers suggest two things: (1) if some stations and other entities were free to deploy a portion of these resources towards broadband infrastructure (perhaps as anchor institutions) and/or content and other applications, we would advance on the goal of a more participatory and productive public media network; and (2) even total redeployment of these resources would *not be enough* to meet community needs for

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<sup>1</sup> Letter of Ellen P. Goodman to Blair Levin, Gen. Dkt. 09-51 (Dec. 29, 2009).

<sup>2</sup> Email of Michael Levy, CPB, to Ellen P. Goodman (Jan. 11, 2010).

public media infrastructure and content, so we must consider other ways (besides a shift from broadcast infrastructure) to fund public media activities.

Sincerely yours,

A handwritten signature in black ink that reads "Ellen P. Goodman". The signature is written in a cursive, flowing style.

Ellen P. Goodman

cc.  
Marlene H. Dortch  
Kevin Bennett  
Eugene Huang