

Re: RM No. 11659

Exall & Wood, PLLC, submits its Statement in Support of the Petition for Rulemaking filed by Geo Broadcast Solutions, LLC (“GBS”) to permit origination of programming on FM booster stations, specifically the exciting potential to allow for localized emergency information to be delivered to residents within targeted areas of large metropolitan markets.

Members of our firm and our families, including young children, live in north Dallas, which is a small part of the sprawling Dallas/Fort Worth metropolitan area. Our radio coverage is provided primarily by a small number of major AM and FM radio stations that service a very large area. North Texas is frequently hit by severe thunderstorms, floods, tornadoes and other weather-related emergencies. These storms can cause great damage where they hit, but they are generally limited to small localized parts of the DFW Metroplex.

I believe that Zonecasting should be embraced by the Commission to permit delivery of localized emergency broadcasting information and warnings to local residents, cutting through the information overload about more remote parts of our market that is of limited use to us in an emergency. Currently, emergency warnings are often related to storms that are twenty miles away with no likelihood of making it near us. It would be very helpful to have a service that provided much more information about emergencies that are likely to affect people in the areas where they live.

The Commission should promote effective and efficient targeting of emergency information and warnings to highly targeted geographic areas. More precisely aimed emergency messages and warnings, geared to specific locales, would be much more effective than messages broadcast to broad geographic areas with less relevance to most listeners.

We are not aware of any technical reason why the GBS proposal should not be considered by the Commission. We believe that the proposal would provide significant public interest benefits to the FM radio industry.

In the spirit of full disclosure, my law firm has provided a small amount of corporate legal services to Geo Broadcast and its partners.

May 23, 2012

Date

*David A. Wood, Partner*

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Signature

**CERTIFICATE OF SERVICE**

I, David A. Wood, hereby certify that I have delivered, on this 23<sup>rd</sup> day of May, 2012, a copy of the foregoing Statement in Support of the Petition for Rulemaking to the following party:

Aaron P. Shainis, Esq.  
Shainis & Peltzman, Chartered  
1850 M Street NW  
Suite 240  
Washington, DC 20036

*David A. Wood, Partner*

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Signature