

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

In the Matter of)	
)	
Emergency Broadband Connectivity)	MB Docket No. 20-445
Fund Assistance)	
)	
)	

**REPLY COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

I. INTRODUCTION AND SUMMARY

The National Association of Broadcasters (NAB)¹ replies to comments on the Commission’s Public Notice concerning its implementation of the Emergency Broadband Benefit Program (Program).² In the Notice, the Commission seeks comment on a wide range of issues, including how to promote awareness of the Program and effectively reach the communities most in need of discounted broadband services and equipment.³ NAB agrees with commenters who identify local broadcast stations as an effective means to reach Americans eligible for the EBB program.

¹ NAB is a nonprofit trade association that advocates on behalf of free local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² *Wireline Competition Bureau Seeks Comments on Emergency Broadband Connectivity Fund Assistance*, Public Notice, WC Docket No. 20-445, DA 21-6 (rel. Jan. 4, 2021) (Notice). The Consolidated Appropriations Act, 2021 (Consolidated Appropriations Act or Act) establishes an Emergency Broadband Connectivity Fund and directs the FCC to use the fund to establish an Emergency Broadband Benefit Program (EBB Program or Program). During an emergency period relating to the COVID-19 pandemic, the Program will provide discounted broadband service and connected devices to eligible households and reimbursements to broadband providers. Consolidated Appropriations Act, 2021, H.R. 133, div. N, tit. IX, § 904(b)(1) (2020).

³ Notice at 12.

II. LOCAL TELEVISION AND RADIO ADVERTISING CAN BUILD BROAD AWARENESS OF THE EBB PROGRAM AND TARGET NICHE AUDIENCES

Several commenters observe that raising awareness of the EEB Program is critical to its successful deployment. The Benton Foundation identifies lack of awareness as one of the major barriers to participation in the Lifeline program by eligible households,⁴ and urges the Commission to ensure that the EBB program is well-publicized so it does not suffer the same fate.⁵ NHMC is concerned that traditional methods of marketing government benefit programs will fail to reach those in greatest need and urges the FCC to prioritize raising awareness through inclusive and culturally relevant advertising, such as radio and television advertising.⁶ Because eligible households are otherwise unlikely to enroll, Public Knowledge similarly states that it is imperative for broadband providers and other stakeholders to publicize the program and that outreach from providers “should include a variety of media outlets that target minority and low-income populations,” including television stations.⁷

⁴ Comments of the Benton Foundation, WC Docket No. 20-445 (Jan. 25, 2021) (Benton Foundation Comments) at 3, *citing* Sallet, Jonathan. October 2019. *Broadband for America’s Future: A Vision for the 2020s*. Evanston, IL: Benton Institute for Broadband & Society. See also *Remarks of Commissioner Geoffrey Starks at State of the Net 2021* (Jan. 26, 2021). According to Universal Service Administrative Company (USAC) data, only 25 percent of eligible households participate in the Lifeline program. USAC, *Program Data, Lifeline Participation*, available at: <https://www.usac.org/lifeline/learn/program-data/>.

⁵ Benton Foundation Comments at 37-40.

⁶ Comments of the National Hispanic Media Coalition, WC Docket No. 20-445 (Jan. 25, 2021) (NHMC Comments) at 6-7 (“NHMC is deeply concerned that traditional methods of marketing government benefit programs will not reach the Latinx, rural areas, and low-income communities, and thus will not provide much needed assistance to those populations . . . radio and television advertising will be necessary to drive awareness for those individuals who would benefit most from the Emergency Broadband program.”).

⁷ Comments of Public Knowledge, WC Docket No. 20-445 (Jan. 25, 2021) (Public Knowledge Comments) at 6-7 (also stating that broadband providers are especially well positioned to publicize the EBB because many of them already advertise other programs as required by FCC rules). *Id.* at 6 (citing 47 CFR § 54.201(d)(2)). See also Comments of Free

NAB agrees that advertising on television and radio stations would be a particularly effective way to raise awareness of the EBB Program, both because of broadcast stations' broad reach and their ability to target the populations most in need of Program information. Television and radio are ubiquitous, reaching nearly every American household.⁸ Radio and television broadcast stations are more heavily relied upon by populations most likely to qualify for the EBB Program, such as households with low incomes. Approximately 40 percent of U.S. television households are equipped with antennae for over-the-air television viewing, and those figures are higher among households with incomes below \$50,000 (45 percent) and Hispanic/Latinx households (43 percent).⁹ Radio listening trends higher among Hispanic/Latinx audiences,¹⁰ as does television viewing among African-American audiences.¹¹ Local broadcast stations also represent a trusted source of information as

Press at 7-8 (urging the Commission to adopt EBB advertising requirements similar to those that apply to the Lifeline program under 47 U.S.C § 214(e)(1)(B)).

⁸ See *Nielsen Estimates 121 Million TV Homes in The U.S. for the 2020-2021 TV Season*, available at: <https://www.nielsen.com/us/en/insights/article/2020/nielsen-estimates-121-million-tv-homes-in-the-u-s-for-the-2020-2021-tv-season/> (“the percentage of total U.S. homes with televisions receiving traditional TV signals via over-the-air antenna, cable, DBS, Telco or via a broadband internet connection connected to a TV set is currently at 96.2%”). Each month, 98 percent of American adults tune into radio stations. Nielsen, *Audio Today 2019* at 5. Radio and television reach more Americans every week than any other platform. *Id.* at 3.

⁹ Horowitz Research, *State of OTA 2020* (December 2020) (self-reported ownership based on an online survey of 2,416 TV content viewers 18+ who are decision makers (using a national online panel)).

¹⁰ See *Nielsen Total Audience Report: Special Work From Home Edition* (Aug. 2020) at 19 (95 percent of Hispanic/Latinx adults listen to radio weekly, compared to 91 percent of American adults generally).

¹¹ See *Nielsen Total Audience Report: Special Work From Home Edition* (Aug. 2020) at 19 (88 percent of African-American adults watch television (including broadcast, pay TV and DVR content) every week, compared to 85 percent of American adults generally).

compared to other sources of news and information,¹² a role that has taken on growing importance during the COVID-19 pandemic.¹³

In addition to its broad reach across U.S. households, radio and television stations also can direct targeted messages to niche audiences. As discussed above, several commenters urge the Commission to ensure that outreach includes people of color and those who primarily speak languages other than English. Advertising on radio stations with formats and/or in-language offerings that attract diverse audiences would be an ideal way to reach these populations,¹⁴ as would advertising on television stations during programming

¹² See, e.g., Knight Foundation, *State of Public Trust in Local News* (October 2019), available at: https://kf-site-production.s3.amazonaws.com/media_elements/files/000/000/440/original/State_of_Public_Trust_in_Local_Media_final_.pdf (more Americans trust local news than national news, with 45 percent of Americans stating that they trust reporting by local news organizations “a great deal” or “quite a lot,” compared to 31 percent for national news organizations; Americans consider local news media are better than national news at covering issues Americans can use in their daily life and in reporting without bias).

¹³ See, e.g., Elisa Shearer, *Local news is playing an important role for Americans during COVID-19 outbreak*, Pew Research Center Factbreak (Jul. 2, 2020) (“Americans also see local news outlets as more credible sources of COVID-19 information than the news media in general.”); Frank Mungeam, *Local TV News Surges as Trusted Source During Coronavirus*, Knight-Cronkite News Lab (Apr. 2020), available at: <https://cronkitenewslab.com/broadcast/2020/04/16/local-tv-audiences-surge-during-coronavirus/> (survey conducted in the early months of the coronavirus pandemic found heavy reliance on, and trust in local TV broadcast news; local TV news was Americans' primary source of local news (41 percent); a majority of those surveyed reported watching local TV news on-air (82 percent), visiting a local station website (69 percent) and using a local station's news app (57 percent); respondents also gave local TV news top marks for performance in serving the audience, with 75% saying local TV news coverage “met or exceeded” their expectations).

¹⁴ For example, the number of Latino-focused full-power AM/FM stations in the U.S. increased by about 70 percent from 2000-2020, reaching 947 stations as of last May. See Reply Comments of NAB, GN Docket 20-60, at 12-13 & note 35 (May 28, 2020) (citing BIA data). This station count did not include FM2, FM3 and FM4 digital channels, a number of which offer programming targeted to minority groups.

that draws large audiences of color and non-English speakers, or the numerous multicast channels focused on these audiences.¹⁵

If publicity or advertising is primarily delivered via platforms such as pay TV services or digital advertising, it may exclude some eligible Americans simply because accessing those platforms requires some form of subscription or other payment. Including free over-the-air local broadcast stations in publicity and advertising campaigns, whether those campaigns are conducted by government agencies or by EBB providers, would be an extremely effective way to reach Americans most in need of EBB Program benefits.

III. CONCLUSION

NAB agrees with several commenters that EBB's eligible populations can be effectively reached by advertising and publicity campaigns that include local television and radio broadcast stations. Because of its combination of broad reach and ability to target niche audiences, broadcasting can raise awareness among many, and focus messaging on populations more likely to require EBB benefits. Moreover, as a free over-the-air service,

¹⁵ See, e.g., Comments of NAB, MB Docket No. 17-214, at 15-16 (Oct. 10, 2017) (discussing how local broadcast TV stations have increased program diversity by airing thousands of multicast channels, many of which offer specialized genres (e.g., comedy, science fiction, faith/family) or target specific demographic groups (e.g., women, African Americans, Hispanic/Latinx audiences); Peter Leitzinger, U.S. *TV station multiplatform analysis 2020: Digital multicast stations thriving*, Kagan (Apr. 9, 2020) (the total number of OTA channels aired by full-power, Class A, and LPTV stations in the U.S. grew to 6,930, up from 2,518 at end of 2010).

broadcasting is one of the few advertising platforms that can reach all eligible Americans.

Respectfully submitted,

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