

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

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| In the Matter of   | ) |                      |
|  | ) |                      |
| Electronic Delivery of Notices to Broadcast<br>Television Stations | ) | MB Docket No. 19-165 |
|  | ) |                      |
| Modernization of Media Regulation Initiative                       | ) | MB Docket No. 17-105 |
|  | ) |                      |
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**REPLY COMMENTS OF THE  
NATIONAL ASSOCIATION OF BROADCASTERS**

The National Association of Broadcasters (NAB)<sup>1</sup> hereby responds to comments filed in the above-captioned proceedings.<sup>2</sup> In the Notice, the Commission seeks comment on whether to modernize its rules requiring cable operators and other multichannel video programming distributors (MVPDs) to distribute certain notifications to broadcasters.<sup>3</sup> The Commission also seeks comment on whether and how its proposal should apply to stations that are not required to maintain an online public inspection file, such as non-Class A low power television (LPTV) stations that are eligible to receive MVPD notices and qualified noncommercial educational (NCE) translator stations.<sup>4</sup> Cable industry commenters oppose an approach that would allow stations to post the contact information on their individual websites, and urge the Commission to adopt a requirement that stations provide this

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<sup>1</sup> The National Association of Broadcasters (NAB) is a nonprofit association that advocates on behalf of local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

<sup>2</sup> Electronic Delivery of Notices to Broadcast Television Stations, Notice of Proposed Rulemaking, MB Docket No. 19-165, FCC No. 19-68 (Jul. 10, 2019)(Notice).

<sup>3</sup> *Id.*

<sup>4</sup> Notice at ¶ 12.

information to the Commission or post this information directly to a Commission-hosted site.<sup>5</sup>

NAB notes that in the carriage election context, the Commission has requested comment on how to apply its new rules to LPTV stations and small cable operators that are not required to have an OPIF or a COALS account.<sup>6</sup> NAB does not object to a rule requiring LPTV stations that are entitled to receive section 76.64(k) and Subpart T notices to designate an email address for receiving such notices electronically on or before July 31, 2020, so long as a similar requirement is applied to small cable operators for purposes of carriage-related communications in the carriage election context.<sup>7</sup> NAB also would not oppose a requirement that stations provide this information to the Commission or post this information directly to a Commission-hosted site, as proposed by NCTA and ACA, so long as a reciprocal requirement is applied to small cable operators for purposes of carriage election notices.

Respectfully submitted,

**NATIONAL ASSOCIATION OF  
BROADCASTERS**  
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September 19, 2019

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<sup>5</sup> Comments of ACA Connects, MB Docket No. 19-165 at 5-6 (Sept. 4, 2019); Comments of NCTA, MB Docket No. 19-165 at 4 (Sept. 4, 2019).

<sup>6</sup> *Electronic Delivery of MVPD Communications*, Report and Order and Further Notice of Proposed Rulemaking, MB Docket No. 17-317, FCC 19-69 (rel. Jul. 11, 2019) ¶¶ 29–30.

<sup>7</sup> NAB does not take a position on the treatment of qualified NCE translator stations.