

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

In the Matter of:)
)
Sports Broadcasting Practices and) MB Docket No. 26-45
Marketplace Developments)
)

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

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I. INTRODUCTION AND SUMMARY

The National Association of Broadcasters (NAB)¹ submits reply comments in the above-captioned matter.² In our comments, NAB described the myriad ways in which broadcast television has generated enthusiasm and loyalty for live sports and how it continues to be the best platform for hosting live sports programming. Live sports likewise have helped support the local news and other local programming. And this symbiotic relationship between broadcast TV and live sports has all served to provide more, higher quality live sports programming for the benefit of consumers. By contrast, the migration of live sports to pureplay streaming services disserves consumers. Pureplay streaming services use live sports programming as a loss leader to sell products and attract subscribers to their platforms. Consumers, on the other hand, pay exorbitant subscription fees and struggle to

¹ NAB is the 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 *FCC's Media Bureau Seeks Comment on Sports Broadcasting Practices and Marketplace Developments*, Public Notice, MB Docket No. 26-45 (Feb. 25, 2026) (Public Notice or Notice).

find games among a maze of services. But despite all the benefits that broadcast TV offers to sports league, TV stations face regulatory hurdles that place them at a disadvantage relative to other media marketplace competitors. NAB therefore observed that the best way to support local broadcasters in vying for telecast rights is to ensure broadcasters can play on a level playing field. That means taking a fresh look at the continuing utility of the Sports Broadcasting Act and modernizing the national and local television ownership rules and the rules necessary to complete the ATSC 3.0 transition.

As it turns out, the public overwhelmingly agrees with NAB's views. Commenters of all stripes venerated broadcast media's consistent, affordable environment for airing live sports programming to all consumers. They also lamented the migration of live sports programming behind paywalled pureplay streaming services. The main contrarian who seems to think higher prices and hard-to-find content are actually good for consumers is the ironically named Consumer Technology Association (CTA). While CTA professes to promote a "consumer-first" mindset, in reality, it only cares about pushing more devices on consumers – even if consumers end up paying thousands of dollars for multiple paywalled pureplay streaming services that make their live sports content harder to find.

In these comments, we highlight the overwhelming response from the marketplace demonstrating the strong public desire to continue hosting live sports programming on broadcast television. We also respond to those who promote this anti-consumer migration of live sports programming behind paywalls that would cost consumers thousands in exchange for a confusing array of subscriptions. Taking the record as a whole, there isn't any credible argument as to why broadcast television shouldn't remain the lifeblood of the live sports ecosystem.

II. THE RECORD OVERWHELMINGLY SUPPORTS HOSTING LIVE SPORTS PROGRAMMING ON BROADCAST TELEVISION

NAB's comments go to some length to explain just how live professional sports have thrived because broadcast TV aired, promoted, and built an entire ecosystem of loyalty around local professional sports teams.³ An overwhelming number of commenters echo NAB's comments when they explain why live sports programming belongs on broadcast TV.

As one commenter succinctly explains:

For decades, the sports broadcasting marketplace worked well for consumers. Networks competed for the right to air games, and that competition produced a virtuous cycle: advertisers paid broadcasters, broadcasters paid leagues, and fans watched for free, or nearly so, over the public airwaves. It was an example of how voluntary negotiations between private-sector actors effectively delivered a public good.⁴

In this Section, we underscore the views of the many commenters who praise broadcast TV for providing an accessible medium for watching live sports programming. We then highlight the views of commenters who explain how live sports programming helps support local broadcasters in providing local news and other local programming. Finally, we discuss how the migration of live sports programming behind paywalled pureplay streaming services costs consumers, sows consumer confusion, limits access, and ultimately makes consumers worse off.

A. Commenters Overwhelmingly Believe Live Sports Programming is Better on Broadcast Television

The record features thousands of comments – many of which praise broadcast TV as the best place to watch live sports. Consistent with NAB's comments, commenters say they

³ Comments of NAB, MB Docket No. 26-45, at 5-11 (Mar. 27, 2026) (NAB Comments).

⁴ Comments of Gerry Wosewick, MB Docket No. 26-45, at 1 (Mar. 20, 2026) (Wosewick Comments).

would rather watch live sports content on broadcast TV because it provides affordable, accessible, and reliable service.⁵ The International Brotherhood of Electrical Workers (IBEW) stated: “Live sports are now, and always have been, appointment television. That experience should be as accessible as possible to consumers.”⁶ The Center for American Rights also observed: “The leagues themselves thrive when they make games available over the air. The leagues, just as much as the fans, win when games are on broadcast.”⁷

The commenters praising broadcast TV’s role in supporting live sports programming, however, aren’t just national organizations. The Market Freedom Alliance, a non-profit organized to support business communities in Arizona, noted that over-the-air (OTA) broadcast television remains “one of the most accessible ways to watch live sports” and “a more reliable experience for live sports.”⁸ The Austin Economic Club observed:

Over-the-air broadcasting remains the most accessible form of sports media distribution. Unlike streaming platforms, which can require multiple subscriptions and high-speed internet, broadcast provides a free or low-cost, widely available way to watch your local sports team play. Thanks to broadcast, you just need an antenna to watch Sunday Night Football and see the Cowboys defeat the Eagles, free of charge.⁹

The county commissioner for Douglas County, Nevada averred: “Live sports programming on broadcast television consistently draws large, engaged audiences, providing local businesses with a reliable platform to advertise and reach customers in their

⁵ NAB Comments at 8-11.

⁶ Comments of International Brotherhood of Electrical Workers, MB Docket No. 26-45, at 1 (Mar. 25, 2026) (IBEW Comments).

⁷ Comment of the Center for American Rights, MB Docket No., 26-45, at 6 (Mar. 27, 2026).

⁸ Comments of Market Freedom Alliance, MB Docket No. 26-45, at 2 (Mar. 20, 2026) (MFA Comments).

⁹ Comments of the Austin Economic Club, MB Docket No. 26-45, at 1 (Mar. 26, 2026) (Austin Economic Club Comments).

communities.”¹⁰ And a former city councilmember from Fayetteville, North Carolina recounted: “Throughout my entire life, I have always been able to catch the latest game via broadcast or over-the-air television. There were never any issues with poor quality, and even more importantly, it was fully accessible and free of charge.”¹¹

These observations spanning from large organizations to local representatives provide an accurate sample of what commenters say about broadcast TV: It’s the medium that makes live sports programming most accessible and reliable to viewers, advertisers, and communities. People of all stripes observe that broadcast TV is the best way to reach local communities. It also bridges the digital and economic divide, ensuring live sports programming isn’t just for the “haves” – wherever you live and whatever your means, live sports programming on broadcast TV ensures that all Americans get to celebrate their local sports teams, which connects them to their local communities.

Not only do commenters across the spectrum celebrate broadcast TV stations for their excellence in airing live sports programming, but as an empirical matter, the record shows that broadcast TV quite simply performs better. As Fox Corporation laid out, the World Baseball Classic between United States and Venezuela attracted World Series-sized audiences of 10.78 million viewers, the Bassmaster Classic drew 502,000 viewers, about 30,000 more viewers than the Charlotte Hornets vs. San Antonio Spurs game on Amazon

¹⁰ Comments of Danny Tarkanian, MB Docket No. 26-45, at 1 (Mar 27, 2026) (Tarkanian Comments).

¹¹ Comments of Bobby Hurst, MB Docket No. 26-45, at 1 (Mar. 25, 2026) (Hurst Comments).

Prime during the same weekend, and Friday night college basketball games attracted almost 50 percent more viewers than NBA games on streaming services.¹²

This relationship, however, doesn't just go in one direction. Commenters also note how live sports programming and broadcast TV have symbiotic relationship. Indeed, live sports programming plays a critical role in ensuring local TV stations can provide indispensable local news and other local programming that serves American communities.

B. Commenters Explain Why Live Sports Programming is Crucial for Ensuring Broadcast TV Stations Can Provide Local News and Other Local Programming

The record also demonstrates how live sports programming is critical to supporting local TV stations, which in turn, helps stations produce and air the local news and other local programming. As NAB explained, live sports programming supports the public interest by generating crucial revenues and viewing audiences for the local news and other local programming hosted by broadcast TV stations.¹³

Broadcasters document the impact that live sports have on the bottom line. The local news is expensive to produce – sometimes comprising one-third (or more) of the station's total expenses on producing and airing the news.¹⁴ Sinclair Inc. explained that advertisers spend approximately \$17.7 billion on national linear TV sports programming, and in particular, the NFL generates \$6.7 billion in annual advertising across all major broadcast

¹² Comments of Fox Corporation, MB Docket No. 26-45, at 6 (Mar. 27, 2026) (Fox Comments); see *also* NAB Comments at 9-11.

¹³ NAB Comments at 17-20.

¹⁴ See Fox Comments at 7 (quoting NAB, *Big Tech's Business Practices Threaten Local Journalism*, at 1 (Apr. 2026)).

networks.¹⁵ And during the 2024-24 season, NFL games accounted for over 23 percent of all ad impressions from the major networks.¹⁶

Broadcasters also find that live sports play a critical role in attracting viewers to a network that ultimately keeps them watching the local news and other local programming. Sinclair provided evidence that local sports contribute to viewership other broadcast TV station content.¹⁷ For instance, in one measurement period, sports content accounted for one-third of all broadcast TV viewing.¹⁸ Fox similarly averred that live sports programming also attracts viewing audiences that helps the network deliver an average of 60 hours per week of local news content on each affiliated owned-and-operated station.¹⁹ The connection between live sports programming and broadcast TV stations isn't lost on the American public, as many commenters recognized how important live sports are to local TV stations. For instance, the IBEW recognized:

[T]he shift to streaming platforms threatens local television stations, whose ability to fulfill their public interest obligation to air local news and public affairs programming depends on the revenue generated from broadcasting live sports. If live sports continue to shift away from over-the-air broadcasting to streaming platforms, local stations will increasingly be unable to operate, and communities and consumers will be robbed of the local programming they rely on.²⁰

The impact isn't exclusively limited to local broadcast TV stations. Because broadcast TV stations support local businesses by creating locally oriented advertising opportunities,

¹⁵ Comments of Sinclair, Inc., MB Docket No. 26-45, at 4 (Mar. 27, 2026) (Sinclair Comments).

¹⁶ *Id.*

¹⁷ *Id.* at 4-5.

¹⁸ *Id.* at 5.

¹⁹ Fox Comments at 8.

²⁰ IBEW Comments at 2.

TV stations often operate as pillars of local communities. A former executive director for the Pennsylvania Republican Party detailed that point further:

Local broadcast stations are not passive content distributors; they're also economic anchors in communities nationwide. Advertising on local broadcast television and radio generates nearly \$1 trillion in GDP and sustains more than 1.37 million jobs annually. Live sports programming is the engine that drives much of this activity, attracting the large, engaged audiences that local businesses depend on to reach potential consumers in their communities.²¹

Finally, the impact extends beyond economic value. Broadcast TV stations also provide extensive coverage of local high school and college sports, which highlights major events and accomplishments by student athletes occurring in the community. America's Public Television Stations detail at length their coverage of local high school and college sports,²² and NAB similarly showcased the work of local TV stations in showcasing the achievements of local athletes.²³ Broadcast TV stations also provide critical public safety announcements. As one commenter observes, broadcast stations are key distributors of FEMA's National Public Warning System, which reaches 90 percent of the U.S. population.²⁴

This symbiotic relationship between live sports programming and broadcast TV stations has served and continues to serve sports leagues, broadcast TV stations, and local communities well. But if this trend of migration of live sports programming continues, it

²¹ Wosewick Comments at 2.

²² Comments of America's Public Television Stations, MB Docket No. 26-45 (Mar. 27, 2026) (APTS Comments).

²³ NAB Comments at 17-20.

²⁴ Wosewick Comments at 2; see *also* Comments of Randy Ross, MB Docket No. 26-45, at 2 (Mar. 25, 2026) (Ross Comments) ("This erosion of our nation's media cornerstone could also have vast impacts on public safety, an issue whose importance cannot be overstated. Florida is one of the most disaster-prone states in the country, facing frequent threats from severe storms, including hurricanes. In instances like these, citizens rely on emergency alerts for critical safety information – alerts that are effective because broadcasters provide them. Take FEMA, for example.").

could seriously undermine the broadcast TV's model for producing local news and other programming. As the Sports Fan Coalition and Public Knowledge succinctly summed up: "If the NFL were to stop distributing games on local broadcast, the entire local broadcast industry in its current form likely would collapse, taking with it not only local news coverage but local amateur sports coverage, such as college and high sports reporting."²⁵

Unfortunately, this beneficial relationship is starting to fracture as professional sports leagues are starting to move more content behind paywalled pureplay streaming services.

C. The Migration of Live Sports Programming Behind Paywalled Pureplay Streaming Services Disserves Consumers and the Public

The record shows deep concern for an emerging trend of professional sports leagues sending more content behind paywalled pureplay streaming services. As NAB observed, streaming services have upended the sports ecosystem as it has started to erode the mutually beneficial relationship between live sports and broadcast TV.²⁶ These services have a global footprint and have no interest in providing content that serves local communities. Instead, they'll pay extraordinary sums to win live sports content that helps those services sell products and attract subscribers to their platforms. Those exorbitant sums, which are subsidized by profits from commercial businesses that have no connection to public interest programming, put significant upward pressure on the fees paid by the broadcasters that bid to air this content, which in turn, funnels higher costs down to local stations. As a result, the public benefits that arise from airing live sports on broadcast TV are diminishing as sports content migrates to pureplay streaming services.

²⁵ Comments of Sports Fan Coalition, Inc. and Public Knowledge, MB Docket No. 26-45, at 5 (Mar. 27, 2026).

²⁶ NAB Comments at 12-18.

Many commenters highlighted how important live sports are to bridge the digital divide with communities that lack financial resources or digital access to subscribe to platforms that carry games behind paywalled services. First, many communities lack the financial resources to pay for multiple streaming services to watch their favorite live sports team. Many commenters called attention to the extraordinary expense to subscribing to these myriad services. By some estimates, it can cost \$1,500 annually to access all NFL games.²⁷

Second, many communities lack access to high-speed Internet, which puts live sports programming on pureplay streaming services completely out of reach. One commenter noted that, according to the U.S. Census Bureau’s 2024 American Community Survey, 19.3 percent of Americans with incomes below \$20,000 lack an internet subscription.²⁸ Another commenter explained that in North Carolina, 15 percent of residents lack access to high-speed internet, which means games hosted on a pureplay streaming service may be totally inaccessible to certain consumers.²⁹ Another commenter observed that, in Florida where over 20 percent of the population is over 65, they would find navigating the “expensive and confusing technology platforms” unpalatable to watch their favorite teams.³⁰

Finally, the record underscores an unsavory side of sports leagues taking away sports content from broadcast TV stations that rely on that content to provide local communities with local sports, local news, and other local programming. First, many local communities

²⁷ Fox Comments at 10; cf. Austin Economic Club Comments at 1 (citing over \$1,000 per year).

²⁸ Comments of State of Streaming, MB Docket No. 26-45, at 4 (Mar. 26, 2026) (SOS Comments).

²⁹ Hurst Comments at 1.

³⁰ Ross Comments at 1.

have paid exorbitant sums of money to subsidize local sports teams. For instance, one estimate finds that approximately 73 percent of total sports venue constructions costs was contributed by the public.³¹ All told, state and local communities have contributed approximately \$30-35 billion to construction and financing major sports leagues facilities in the United States.³² And yet, while sports leagues take funding to build major sports complexes, they don't feel a similar need to support broadcast TV, which provides critical local news and other programming to local communities, by keeping live sports programming on broadcast TV channels.

Second, as pureplay streaming services bid exorbitant sums for live sports programming, that imposes upward pressure on the fees that broadcasters must pay to air this content. As fees rise to broadcasters, that ultimately results in higher costs to local stations that are already fiscally strained. While the sports leagues may think that live sports programming should be a loss leader for broadcast TV stations, the real "loss" comes in the form of further strain on public interest programming, like the local news and other local programming.

As most commenters recognize, this migration of live sports programming poses a serious risk of hurting not only broadcast TV stations but also viewers and local communities who rely on this symbiotic partnership to see local news content. Nevertheless, a handful of commenters – notably, CTA – are totally unphased by the prospect of losing local news, local programming, and other community benefits – so long as streaming services can sell products and subscriptions and device manufacturers can sell more products to consumers.

³¹ Sinclair Comments at 8.

³² *Id.*

III. CTA OFFERS NOTHING MORE THAN SOPHIST OBSERVATIONS DESIGNED TO PUSH MORE DEVICES ON CONSUMERS ALL WHILE CONSUMERS LOSE ACCESS TO LIVE SPORTS

CTA and a handful of other commenters claim this migration of live sports programming behind paywalled services is somehow pro-consumer. They raise navel-gazing arguments claiming consumers are better off. But consumers don't want this, and these commenters don't provide a shred of evidence suggesting that they do. By contrast, the voluminous record of consumers opposing the migration of live sports programming behind a paywalled streaming services demonstrates the overwhelming antipathy to this emerging trend. In this Section, we explain why CTA's comments are self-serving and reflect nothing that consumers want. We close by reviewing other commenters' flawed arguments.

A. CTA Pushes an Agenda to Sell More Devices All While Arguing Positions that Would Cost Consumers More Money in Subscription Fees and Give Consumers Less Choice and Less Access

Through its comments, CTA demonstrates once again that it could care less about consumers so long as it can pile another device into consumers' shopping carts. CTA plugs a laissez-faire view of the marketplace where the "free market delivers more choices for consumers to view a greater diversity of sports on a wider variety of devices."³³ We are all for market competition, but the emerging trend of migrating content behind paywalls is undoubtedly giving consumers less – not more – choice.

CTA blithely claims that, with the migration of more sports content onto streaming services, "*fans* customize their viewing choices, rather than relying solely on the decision of broadcast or network executives."³⁴ This is absurd. Before sports programming started to

³³ Comments of the Consumer Technology Association, MB Docket No. 26-45, at 1 (Mar. 27, 2026) (CTA Comments).

³⁴ *Id.* at 3 (emphasis in original).

gravitate behind a paywalled streaming services, fans could customize their viewing choices by flipping a channel. Today, fans pay thousands of dollars for subscriptions to “customize” their access to live sports programming. Nothing exemplifies more how consumers truly feel about this so-called newfound ability to customize than a growing trend of streaming service cancellations after the end of the sports season. The State of Streaming comment cited a StreamTV Insider report finding 65 percent of signups for top streaming services that hosted live NFL games resulted in cancellations after the season ended.³⁵ They also highlighted a LendingTree Survey that found more than half of subscribers signed up for a streaming service to watch one piece of content and then subsequently cancelled, and 72 percent of U.S. streaming subscribers believe that they pay too much for the service.³⁶ Surely, this endless cycle of subscribing and cancelling streaming services isn’t pro-consumer.

CTA also perplexingly claims that streaming services are somehow special because they air niche sports, women’s leagues, and high school games. First, NAB and other commenters submitted substantial evidence of broadcasters airing niche sports, women’s leagues, and high school sports.³⁷ Putting that aside, broadcasters do something that streaming services don’t even try to do – they build loyalty for local professional, college, and high school teams and athletes by conducting extensive reporting on local sporting events.

Perhaps the biggest hypocrisy in CTA’s comment is their celebration of streaming

³⁵ SOS Comments at 3.

³⁶ *Id.*

³⁷ NAB Comments at 19-20 (describing the local sports covered on broadcast TV); *id.* at 25 (noting that broadcast TV stations have started bidding for WNBA rights) *cf* APTS Comments (describing the various high school sports covered on public television).

technologies for enabling “new viewer-driven interactive opportunities for replays, highlights, behind-the-scenes content, multiple camera angles, real-time statistics and social engagement features.”³⁸ When broadcasters develop the very same rich features by trying to complete the transition to the ATSC 3.0 standard, CTA has dragged its feet at every step through that proceeding.³⁹ This asymmetric treatment exposes CTA’s motives: They don’t care a wit about consumers or consumer choice. If there’s a buck to be made on a consumer device, CTA is all too happy to shamelessly contrive a fiction that somehow consumers are better off having to pay more money to watch live sports programming. But when there is a whiff of a requirement to update devices to support broadcasters’ transition to a consumer-friendly broadcast standard – that the public can access *for free* – CTA is violently opposed. The Commission should see through the ruse: CTA makes no bones about serving consumer – let only public – interests in its advocacy; it only cares about selling more devices to consumers and in a manner where they retain all consumer data.

CTA concludes its comments by claiming: “Thanks to streaming platforms, fans have more access than ever to their favor sports teams – wherever and whenever they play.”⁴⁰ Of course, CTA provides no support – no data, no facts, not even a testimonial – for this bald, unserious assertion. On the other hand, the record is replete with evidence emphatically maintaining that fans have *less* access to live sports programming and are all the worse for it. Given the insincerity and lack of substantiation of its advocacy, the Commission should disregard CTA’s views for what they are: totally unserious.

³⁸ CTA Comments at 4.

³⁹ Reply Comments of NAB, GN Docket No. 16-142, at 10-14 (Feb. 18, 2026).

⁴⁰ CTA Comments at 7.

B. Other Commenters Similarly Make Absurd, Unsubstantiated Claims About How Consumers Are Better Off Paying Exorbitant Fees to Access Live Sports Programming

In addition to CTA, there are a few other commenters who make unsupported claims about the benefits of pureplay streaming services that are entirely belied by the reams of evidence and testimonials on the record. Like CTA, they claim that streaming services have somehow expanded access to live sports programming that was once available for free.⁴¹ They claim that streaming has boosted viewership,⁴² but that claim doesn't bear out when compared to viewership on broadcast TV, which as discussed above and in NAB's comments, generally delivers the largest viewing audience.⁴³ Much like CTA's comments, these commenters fail to provide an iota of evidence to support their position. In addition to these weak arguments, however, ICLE goes one step further and absurdly asserts that local news is not dependent on broadcasting.⁴⁴ They argue that social media, local websites, newsletters, independent online outlets, blogs, newsletters, or video channels all are potential substitutes for the local news. This is downright foolish. None of these informal sources employ professional reporters and staff that: have connections with the local community; break local news like crimes, severe weather events, accidents, or other major events; provide context around major local news stories; cover local government; support the local community; or provide a myriad of other benefits to local communities in the way broadcast TV stations do in providing the local news. This Pollyannish, unsubstantiated

⁴¹ See, e.g., Comments of the International Center for Law & Economics, MB Docket No. 26-45, at 5-6 (Mar. 27, 2026) (ICLE Comments) (arguing that paywalled sports content can expand access); Comments of the Computer & Communications Industry Association, MB Docket No. 26-45, at 1-4 (Mar. 27, 2026) (CCIA Comments).

⁴² See, e.g., CCIA Comments at 3.

⁴³ NAB Comments at 8-11.

⁴⁴ ICLE Comments at 8.

theorizing represents their utter unseriousness. ICLE's arguments lack any substantiation and are divorced from reality, and that's a consistent theme that runs across the whole comment. Add that to these foolhardy notions that somehow consumers are better off paying thousands of dollars to access live sports programming, and it starts to become clear that these comments offer more lazy navel-gazing than thoughtful, evidence-based observations about the media marketplace for live sports programming.


IV. CONCLUSION

The record overwhelmingly supports what NAB explained in our comments: Broadcast TV is the best medium for airing live sports programming. Broadcast TV delivers affordable, accessible, and reliable live sports programming to communities across the country. And live sports programming, in turn, supports the local news and other local programming. By contrast, streaming services impose high costs, create consumer confusion, and diminish access to live sports, and the migration of live sports programming behind paywalled streaming services deprives the public of broadcast TV's public interest-oriented programming. The few commenters who claim streaming services serve consumers better provide no evidence and most certainly cannot rebut the reams of support expressed on the record for continuing to host live sports programming on broadcast television. For all those reasons, as outlined in NAB's comments, the Commission should support broadcasters by modernizing the national and local ownership rules and the rules required to complete the ATSC 3.0 transition and take a fresh look at whether the Sports Broadcasting Act is still required.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read "Rick Kaplan", with a long horizontal flourish extending to the right.

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