

Congress of the United States  
Washington, DC 20515

September 16, 2022

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The Honorable Jessica Rosenworcel  
Chairwoman  
Federal Communications Commission  
45 L Street, NE  
Washington, D.C. 20554

Dear Chairwoman Rosenworcel:

We write to express deep concern about a proposal being pursued by GeoBroadcast Solutions (GBS) at the Commission, which would allow the use of GBS's geo-targeting technology and permit advertisers to provide advertisements to selected neighborhoods within a radio station's market while overlooking other different neighborhoods. We share the legitimate concerns thoughtfully raised by our colleagues Representatives Yvette Clarke and Darren Soto in their July 6, 2022 letter to you about the likely potential harms of this technology to communities of color, as they rely heavily on broadcast radio for free news, emergency information, and entertainment. Radio stations already provide service to each and every listener within that station's service area who tune into and enjoy that local station's format irrespective of the area of town in which the listener resides. GBS's technology takes a dangerous turn of enabling advertisers to pick the consumers it values most by geography, overlooking potentially entire swaths of a station's loyal listeners.

All communities should be treated equitably and have full access to the many benefits free over-the-air broadcast radio offers pursuant to their license. While promoted as a tool to serve Black and Brown communities, GBS's technology could be used by advertisers to engage in discriminatory practices and "cherry pick" only certain listening audiences in a station's market while ignoring altogether other parts of the station's market. Any potential benefit from GBS's technology must accordingly be weighed against this significant risk for harm.

We thus ask the Commission not to adopt GBS's proposal. We would also appreciate copies of your answers to the questions posed by Representatives Yvette Clarke and Darren Soto in their July 6, 2022 letter. We look forward to your response.

Sincerely,

  
TONY CÁRDENAS  
Member of Congress

  
STEVEN HORSFORD  
Member of Congress