

ROBIN L. KELLY
2ND DISTRICT, ILLINOIS

2416 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
PHONE: (202) 225-0773
FAX: (202) 225-5681

www.RobinKelly.house.gov

Congress of the United States

House of Representatives

DISTRICT OFFICES:
600 HOLIDAY PLAZA DRIVE
SUITE 505
MATTESON, IL 60443
PHONE: (708) 679-0078

1000 E. 111TH STREET
SUITE 5N
CHICAGO, IL 60628
PHONE: (773) 321-2001

December 12, 2022

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The Honorable Jessica Rosenworcel
Chair
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Dear Chair Rosenworcel,

I write to you today regarding the Federal Communications Commission's (FCC) Notice of Proposed Rulemaking (NPRM) on FM booster stations that would allow FM radio stations to geo-target content to portions of their authorized service area.¹ FM radio broadcasting continues to serve an important role in our communities as it can be the primary or only means of information and entertainment. As a member of the U.S. House of Representatives Committee on Energy and Commerce, which has jurisdiction over your commission, I urge the FCC to conduct a thorough review to ensure this proposed rule change would indeed help local radio stations to better compete in the media marketplace, while not causing unacceptable interference for listeners.

Currently, FM radio stations must provide the same content to everyone in a coverage area. A technology, sometimes referred to as "ZoneCasting", empowers radio stations to be more relevant to different community needs within their broadcast area. Specifically, ZoneCasting allows radio stations to deliver geo-targeted and specialized content to specific areas within their overall coverage area. This includes delivering ads, public service announcements, public health messages, and other culturally relevant community content to areas within a coverage area serving high concentrations of Black and other minority audiences.

As with many new technologies that could change the landscape of an industry, there are competing interests and analyses of how ZoneCasting could benefit the public and FM broadcasters. The proprietary owner of the ZoneCasting technology, GeoBroadcast Solutions, argues it would help level the playing field by permitting advertisers to target the most relevant neighborhoods within their coverage area, thereby allowing some FM broadcasters to be more competitive with local digital media. GeoBroadcast Solutions further argues that ZoneCasting "can help stations provide content to better serve their communities by offering hyper-localized news, weather, emergency alerts, advertising, and alternative languages during a small part of the broadcast hour."² Conversely, opponents of ZoneCasting, notably the National Association of Broadcasters, believe "it would threaten radio listeners' access to timely news and information about emergencies, move advertising away from less affluent communities, limit information in diverse areas, and destabilize radio's advertising-based business model."³

¹ Amendment of Section 74.1231(i) of the Commission's Rules on FM Broadcast Booster Stations, Notice of Proposed Rulemaking, MB Docket No. 20-241, FCC No. 20-166 (rel. Dec. 1, 2020) (NPRM).

² GeoBroadcast Solutions. "GeoBroadcast Solutions Addresses Industry Comments in Reply to FCC NPRM To Modify Commission's Rules Governing the Operation of FM Booster Stations by FM Radio Broadcasters." *GeoBroadcast Solutions Press Release*, 12 Mar. 2021.

<https://static1.squarespace.com/static/5b4678684cde7a1a3ff19df8/t/604bca2054d96737fd71e9c4/1615579680236/GBS+Fiiles+Reply+Comments+-+FINAL.pdf>. Accessed 6 Dec. 2022.

³ "ZoneCasting" Technology Harms Local Radio and Diverse Communities. Retrieved from the National Association of Broadcasters (nab.org).

These opposing views of how ZoneCasting could impact our communities are the reason why I believe there needs to be a robust review conducted by the FCC to ensure both consumers and minority independent stations benefit from any potential rule. This technology could potentially be beneficial, so we must ensure this technology is used for the good and not to the detriment of our communities. Regardless of which path is decided on rulemaking, I urge the FCC to conduct a thorough review to gather more data about this potentially beneficial technology before making a final decision on the proposed rule change to FM booster stations.

Sincerely,

A handwritten signature in black ink that reads "Robin L. Kelly". The signature is written in a cursive style with a large initial "R" and "K".

Robin L. Kelly
Member of Congress