

December 13, 2022

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

Dear Chairwoman Rosenworcel:

I write regarding the significant public interest in the proposed Federal Communication Commission (FCC) rule change to permit the use of ZoneCasting technology by FM radio broadcasters. As you know, GeoBroadcast Solutions LLC (GeoBroadcast)'s ZoneCasting technology enables booster geo-targeting capabilities by FM radio broadcasters. A diverse array of respondents—established industry stakeholders, broadcasters of all sizes, civil rights advocates, radio engineers, and members of the listening public—have raised concerns about ZoneCasting that deserve the Commission's attention.

As you know, the technology the Commission is considering would allow radio stations to geo-target programming, including emergency alerts, news, and advertising, to different areas and communities. Because radio stations operate under licenses that require them to broadcast to a specific geographic area, ZoneCasting would create a new regime where advertisers and stations could pick and choose who hears different types of information and solicitations. And because most radio play occurs while listeners are traveling by car, with ZoneCasting, listeners could hear varying content as they drove around a single region, for example, through Maryland, Washington, D.C., and Virginia, as many do regularly during a single trip.

Comments submitted to the FCC warn that the hyper-targeted messaging ZoneCasting enables could reduce the effectiveness of emergency alert systems, exacerbate racial inequity by restricting content and advertising, and undermine the overall economic ecosystem of the broadcast industry, specifically disadvantaging small and minority-owned radio stations. The limited testing of the technology, which has led to uncertainty about the degree of disruption to listeners and stations from signal interference, is also noteworthy. Despite the voluntary nature of the proposed change, this new technology would be an added expense for radio stations to acquire and maintain.

Therefore, I urge you to seriously consider the concerns raised by respondents and work to address and resolve them to the satisfaction of all parties before any modification of FCC's rules.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, reading "Chris Van Hollen". The signature is fluid and cursive, with the first name "Chris" being the most prominent part.

Chris Van Hollen
United States Senator