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National Association of Black Owned Broadcasters



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of State Legislators



N.O.B.E.L.



WOMEN



National  
Urban League



May 1, 2020

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

**Re: Comments in Support of RM-11854 (Zoncasting)**

Dear Ms. Dortch:

The Multicultural Media, Telecom and Internet Council (“MMTC”), along with the 21 undersigned national public interest, civil rights, and business advocacy organizations (“Civil Rights Advocates”) whole-heartedly support the Petition for Rulemaking (“Petition”) filed by GeoBroadcast Solutions, LLC which asks the Commission to permit radio broadcasters the option to deploy technology that could geo-target content on their FM boosters. In this way, the stations could provide hyper-localized and alternative language news, weather, emergency alerts, and advertising during a fraction of the broadcast day. This engineering reform would permit minority-owned stations to better serve their communities. We ask the Commission to promptly move forward with a notice of proposed rulemaking regarding the Petition.

For decades, radio has been the heritage communications technology for minority entrepreneurs who are seeking to become owners. Radio has been especially vital to minority communities because it has provided an affordable means of serving communications needs that are not always well served by other media. Radio transmits information, opinion, and culture to an audience that includes virtually every minority household in the nation.

The racial wealth gap is striking and persistent, and has played a significant role in perpetuating inequalities in almost every sphere of life, including education, healthcare, housing, and business ownership. For minority entrepreneurs, building equity through ownership of federally licensed assets, such as radio stations, has been beneficial in overcoming systemic barriers to access to capital.

The ability to geo-target content on radio will be especially beneficial to minority broadcasters and their advertisers, and could have significant benefits for their programming and for minority ownership in radio overall. Minority-owned stations' coverage areas tend not to be as extensive as the coverage areas of stations with which they compete.<sup>1</sup> Therefore, minority owned stations typically don't attract the advertising dollars their competitors attract. As the Petition demonstrates with a recent study by BIA Advisory Services and Advertiser Perceptions,<sup>2</sup> the ability to geo-target advertising greatly enhances a station's appeal to advertisers by enabling ad buys to be targeted geographically. It has been well documented in this country that geographics often line up closely with demographics, including race, ethnicity, and primary language. Consequently, geo-targeting is likely to enhance all stations' ability to deliver desired audiences for certain advertisers. This attribute would positively impact the value of most minority owned radio stations. That, in turn, will enable the stations to enhance their programming, and improve their owners' access to capital, their creditworthiness, and their ability to acquire other stations and stave off forced sales of their own stations.

The benefits of geo-targeting are not limited to advertisers. The ability to program hyper-local content, including second-language content, during part of the broadcast day will also be especially beneficial to minority broadcasters. Most minority-owned stations are located in large and medium-sized diverse metropolitan areas. These are areas large enough to support multiple zones. All radio broadcasters can benefit from geo-targeted content and weather programming. By enabling stations to serve geographically-defined communities, the technology will particularly assist broadcasters wishing to focus primarily on minority or multilingual communities with targeted news updates and advertising.

The Civil Rights Advocates urge the Commission to promptly move forward with the Petition. It stands to greatly benefit minority broadcasters. As use of the technology is voluntary, it imposes no harm—only a key avenue for broadcasters to explore in how to best serve their communities.

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<sup>1</sup> See, e.g., David Honig, *How the FCC Suppressed Minority Broadcast Ownership, and How the FCC Can Undo the Damage it Caused*, XII S. J. Pol'y & Just. 44, 81-84 (2018) (“Not only have minorities secured few facilities, those they did secure were usually technically inferior, such as high-band low power AMs and low-tower low power FMs. Today, minorities continue to be burdened by inferior technical facilities . . .”).

<sup>2</sup> Petition for Rulemaking, GeoBroadcast Solutions, LLC, RM-11854 at Exhibit B (Mar. 13, 2020).

Respectfully,<sup>3</sup>

Black College Communication Association  
Black Female Founders  
Blacks in Government  
Hispanic Federation  
International Black Broadcasters Association  
MANA, A National Latina Organization  
Multicultural Media, Telecom and Internet Council  
National Action Network  
National Association for the Advancement of Colored People  
National Association of Black Owned Broadcasters  
National Asian American Coalition  
National Coalition on Black Civic Participation  
National Congress of Black Women  
National Council of Negro Women  
National Diversity Coalition  
National Hispanic Caucus of State Legislators  
National Organization of Black County Officials, Inc.  
National Organization of Black Elected Legislative Women  
National Puerto Rican Chamber of Commerce  
National Urban League  
U.S. Black Chambers, Inc.

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<sup>3</sup> Communications regarding this letter may be directed to David Honig, President Emeritus and Senior Advisor, MMTTC, at [dhonig@mmtcoonline.org](mailto:dhonig@mmtcoonline.org) or 202-669-4533.