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March 12, 2021

Marlene Dortch, Esq.
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: RM-11854, MB Docket Nos. 20-401, 17-105 (FM booster rule change)

Dear Ms. Dortch:

The Multicultural Media, Telecom and Internet Council (“MMTC”) and the National Association of Black Owned Broadcasters (“NABOB”) respectfully submit this letter in response to the NPRM in this proceeding.¹

The NPRM contains 103 questions.² Fortunately, many of the 103 questions may be answerable with engineering and economic data that could be produced by a pilot test of the technology.

Consequently, MMTC and NABOB encourage the leading parties to collaborate with one another to design and execute a pilot with at least three markets: urban, suburban, and rural. We recommend that the pilot be designed to address all of the questions raised in the comment round of this proceeding, including the impact of the technology on local advertising markets.

We encourage the Commission to help unite all parties in the quest for a universally beneficial result.

Respectfully submitted,

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¹ Amendment of Section 74.1231(i) of the Commission’s Rules on FM Broadcast Booster Stations, MB Docket Nos. 20-401, 17-105.

² Notice of Proposed Rulemaking, FCC 20-166 (released December 1, 2020) (“NPRM”).