

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Implementation of Section 1003 of the ) MB Docket No. 20-31  
Television Viewer Protection Act of 2019 )  
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**COMMENTS OF THE  
NATIONAL ASSOCIATION OF BROADCASTERS**

The National Association of Broadcasters (NAB)<sup>1</sup> files these brief comments in support of the Commission’s proposed rules implementing Section 1003 of the Television Viewer Protection Act of 2019 (TVPA).<sup>2</sup> The Notice proposes to adopt rules defining the term “large station group” to mean “an entity whose individual television station members collectively have a national audience reach of more than 20 percent;”<sup>3</sup> and the term “qualified [multichannel video programming distributor (MVPD)] buying group” to mean “an entity that negotiates on behalf of MVPDs that collectively serve no more than 25 percent of all households receiving service from any MVPD in a given local market.”<sup>4</sup> NAB agrees that these proposals comport with Congress’s intent in enacting the TVPA. The Notice also proposes to codify the statutory provisions governing negotiation of retransmission consent between qualified MVPD buying groups and large station groups,<sup>5</sup> the definitions of “local

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<sup>1</sup> NAB is a nonprofit trade association that advocates on behalf of free local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

<sup>2</sup> *Implementation of Section 1003 of the Television Viewer Protection Act of 2019*, Notice of Proposed Rulemaking, FCC No. 20-10, MB Docket No. 20-31 (rel. Jan. 31, 2020) (Notice).

<sup>3</sup> Notice at ¶¶ 1, 6-7.

<sup>4</sup> Notice at ¶¶ 1, 6-8.

<sup>5</sup> Notice at ¶ 9 (citing 47 U.S.C. § 325(b)(3)(C)(vi)(I)-(III)).

market” and “multichannel video programming distributor” set forth in section 1003(b)(3),<sup>6</sup> and make certain other conforming changes.<sup>7</sup> NAB agrees that the proposed rule changes are appropriate to effectuate the TVPA.

Respectfully submitted,

**NATIONAL ASSOCIATION OF  
BROADCASTERS**  
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March 5, 2020

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<sup>6</sup> Notice at ¶ 9 (citing 47 U.S.C. § 325(b)(&)(E), (F)).

<sup>7</sup> Notice at ¶ 9 (proposing to delete the phrase “as defined in 17 U.S.C. § 122(j)” from its rules as required by Section 1003(c)(2)).