

NATIONAL ALLIANCE OF STATE BROADCASTERS ASSOCIATIONS

Alabama Broadcasters Association
Alaska Broadcasters Association
Arizona Broadcasters Association
Arkansas Broadcasters Association
California Broadcasters Association
Colorado Broadcasters Association
Connecticut Broadcasters Association
Florida Association of Broadcasters
Georgia Association of Broadcasters
Hawaii Association of Broadcasters
Idaho State Broadcasters Association
Illinois Broadcasters Association
Indiana Broadcasters Association
Iowa Broadcasters Association
Kansas Association of Broadcasters
Kentucky Broadcasters Association
Louisiana Association of Broadcasters
Maine Association of Broadcasters
Massachusetts Broadcasters Association
Maryland, DC, Delaware Broadcasters
Michigan Association of Broadcasters
Minnesota Broadcasters Association
Mississippi Association of Broadcasters
Missouri Broadcasters Association
Montana Broadcasters Association
Nebraska Broadcasters Association
Nevada Broadcasters Association
New Hampshire Association of Broadcasters
New Hampshire Broadcasters Association
New Jersey Broadcasters Association
New Mexico Broadcasters Association
The New York State Broadcasters Association
North Carolina Association of Broadcasters
North Dakota Broadcasters Association
Ohio Association of Broadcasters
Oklahoma Association of Broadcasters
Oregon Association of Broadcasters
Pennsylvania Broadcasters Association
Pillsbury Winthrop Shaw Pittman LLP
Puerto Rico Broadcasters Association
Rhode Island Broadcasters Association
South Carolina Broadcasters Association
South Dakota Broadcasters Association
Tennessee Association of Broadcasters
Texas Association of Broadcasters
Utah Broadcasters Association
Vermont Association of Broadcasters
Virginia Association of Broadcasters
Washington State Association of Broadcasters
West Virginia Broadcasters Association
Wisconsin Broadcasters Association
Wyoming Association of Broadcasters

June 29, 2011

The Honorable Harry Reid
Majority Leader
United State Senate
S-221 Capitol Building
Washington, DC 20510

The Honorable Mitch McConnell
Minority Leader
United States Senate
S-230 Capitol Building
Washington, DC 20510

Dear Leaders Reid and McConnell:

As Congress works to craft comprehensive spectrum policy, we write to express the views of America's local broadcasters. We support efforts to provide our nation's first responders with a state-of-the-art broadband network while freeing up spectrum for advanced wireless services. In doing so, it is important that Congress protect the interests of television viewers and the services free local TV stations provide.

As our nation's original wireless communications service, local television stations work hand-in-hand with our nation's first responders in times of emergency. Through this partnership, we understand the need for an interoperable public safety network, in addition to a robust free broadcast system. As shown by the recent natural disasters across the country, local broadcasters are not only irreplaceable as the first alert of incoming danger, they are also integral in the rebuilding of communities. Local broadcasters take seriously their obligations as stewards of the nation's public airwaves.

Local television broadcasters are grateful for the leadership of Chairman Rockefeller and Ranking Member Hutchison for incorporating a solid framework for voluntary incentive auctions outlined in S. 911. However, our concerns are directed at the "repacking" provisions of the legislation, and the need for adequate viewer protections that will preserve the ability of all Americans to continue to receive a robust, free over-the-air television signal.

The Federal Communications Commission (FCC) should be required to replicate each remaining station's coverage area so that no viewers are disenfranchised. Even if stations are assigned new channels, every remaining station should be permitted to broadcast in the same manner they do today. They should not be reassigned to channels that consumers have difficulty receiving. Additionally, stations should be able to rely on the same interference rules that are in place today. A reduction in any of these protections will ultimately disenfranchise viewers. Consumers in urban areas will find it difficult to receive their favorite TV stations with indoor antennas. It will also make it more difficult to receive signals in rural areas, which are typically at the outer

fringes of a television station's coverage area.

A recent study has found that nearly 46 million viewers rely exclusively on over-the-air broadcasts for their television service. And most cable systems rely on an over-the-air signal to retransmit to their subscribers. It is vital that the coverage patterns and technical integrity of television transmissions be protected.

We also want to raise concerns about the need to ensure stability for consumers on a going-forward basis. Two years ago our country completed its transition to digital television in which every television station shut off its analog transmitter and broadcast only in a digital format, typically on a different channel. The result was a considerable amount of confusion for television viewers. Even today, there continue to be viewers who cannot receive a signal from a station they previously viewed without difficulty.

The repacking provisions of S. 911 contemplate a similar, and perhaps more complex, transition, which we anticipate will cause confusion and possible disruption for many television viewers. In our view, the FCC should be limited to holding a single incentive auction, and minimize the impact of repacking on the remaining television stations, so that viewers are not continually subjected to the confusion that results from stations shifting from one channel to another.

Television broadcasters spent over \$10 billion to comply with the government mandates to convert to digital television. If the government is now going to rearrange the television broadcast bands again, it is essential this legislation address the economic impact of relocation.

The American system of television broadcasting is unique in all the world. Our viewers rely on the ubiquitous availability of free, over-the-air television. We urge you to help us remedy these remaining concerns before the legislation is scheduled for consideration by the Senate. It is imperative that the television stations we represent retain the flexibility to continue to innovate as technologies and markets evolve.

Sincerely,

America's Independent State Broadcast Associations

cc:

The Honorable Jay Rockefeller
The Honorable Kay Bailey Hutchison

Sharon M. Tinsley



Alabama Broadcasters Association
Sharon Tinsley

Darlene Simono



Alaska Broadcasters Association
Darlene Simono

Art Brooks



Arizona Broadcasters Association
Art Brooks

Doug Krile



Arkansas Broadcasters Association
Doug Krile

Stan Statham



California Broadcasters Association
Stan Statham

Byron Grandy



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Michael C. Rice



Connecticut Broadcasters Association
Mike Rice

Pat Roberts



Florida Association of Broadcasters
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Lisa Reynolds



Maryland/D.C./Delaware (MDCD) Broadcasters Association
Lisa Reynolds

Jordan Walton



Massachusetts Broadcasters Association
Jordan Walton

Karole L. White



Michigan Association of Broadcasters
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Jim du Bois



Minnesota Broadcasters Association
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