

July 10, 2025

Dear Commissioner,

We, the undersigned organizations, **urge you to reject the National Association of Broadcaster's petition to force competitors to use their preferred technology.** While broadcasters operate under the strain of onerous regulation dating from the Second World War, new mandates on other technologies are not the solution.

NAB petitioned the Commission to mandate the adoption of Next Generation Television (Next Gen TV) with Advanced Television Systems Committee (ATSC) standards, despite widespread adoption already. Next Gen TV is already operating on ATSC 1.0 to ATSC 3.0 technologies available for broadcasters and multichannel video programming distributors (cable and satellite) should they choose to use it.

And they have chosen. More than three out of every four Americans have access to ATSC 3.0. It is available in more than 80 markets in parallel to ATSC 1.0 technology delivering digital television. The argument that this is even a problem demanding the Commission's intervention is flimsy given this fact.

By any reasonable standard, this is a success. Under the Commission's original 2017 report and order authorizing ATSC 3.0, broadcasters are allowed use the new standard on a "voluntary, market-driven basis." **The Commission should maintain its voluntary, market-driven adoption policy that has reached the vast majority of Americans, not embrace a mandate just to reach the small minority of markets broadcasters have struggled to penetrate.**

NAB effectively asks the FCC to do their job for them by mandating ATSC adoption in the remaining markets to reach the untapped 25 percent or so of the population. In what is unfortunately a tale as old as time, they would rather use the government to limit genuine competition by forcing their competitors to adopt their standards, ironically in the name of "competition," than petition the government to reduce their own regulatory burden so they can meet the challenges of the 21st Century.

The Commission should take the plight of broadcasters seriously. They should be understood as a legacy technology that was saddled with a steep regulatory burden back when that was in vogue in the mid-20th Century. The solution now is to deregulate and allow genuine market competition to dictate which technologies survive and thrive. This is precisely what the FCC did in 2017 with the original ATSC 3.0 order. The FCC should stick to this roadmap that has empowered consumer choice while allowing broadcasters to consolidate and capitalize.

We thank the FCC for its attention to this matter and urge you reject mandates and maintain market-driven approaches to new technologies.





Sincerely,

Grover Norquist
President
Americans for Tax Reform

Bartlett Cleland
Executive Director
Innovation Economy Alliance



James Erwin
Executive Director
Digital Liberty

Jeff Mazzella
President
Center for Individual Freedom

Deborah Collier
Executive Director
Citizens Against Government Waste

Paul Gessing
President
Rio Grande Foundation



Chuck Muth
President
Citizen Outreach

David Williams
President
Taxpayer Protection Alliance



Daniel Erspamer
CEO
Pelican Institute

Matthew Kandrach
President
Consumer Action for a Strong Economy



Jarrett Skorup
Vice President for Marketing and Communications
Mackinac Center for Public Policy

Edward Longe
Director of Technology and Innovation
James Madison Institute

Tom Giovanetti
President
Institute for Policy Innovation

Rosemary Becchi
Founder and President
Jersey 1st

Jeff Westling*

Luke Hogg*

*Indicates Individual Signer