



Congress of the United States  
House of Representatives

MARKWAYNE MULLIN  
2ND DISTRICT, OKLAHOMA

The Honorable Jessica Rosenworcel  
Chairwoman  
Federal Communications Commission  
45 L Street Northeast  
Washington, DC 20554

July 28, 2022

Chairwoman Rosenworcel,

I write regarding the rule change being put forward that would permit stations to use GeoBroadcast Solutions' (GBS) ZoneCasting™ technology and allow advertisers to subdivide radio markets by selling different advertisements to different neighborhoods. Broadcasters in my district are concerned that, if granted, this capability would threaten radio listeners' access to timely news and information about emergencies, disadvantage smaller stations that cannot reasonably afford to employ the proprietary technology, and destabilize radio stations' advertising-based business model, especially that of smaller and minority-owned stations.

There is great concern that GBS's ZoneCasting system interferes with broadcasters' signals, producing prolonged periods where listeners cannot receive a station's signal. The two recent GBS tests do nothing to calm these concerns. Both tests were not designed to prove that GBS's proprietary technology can work effectively in most or all real-world scenarios, but rather, were carefully designed to replicate service in only the most ideal conditions. Even with such favorable testing conditions, neither test demonstrated that ZoneCasting can be deployed without negatively affecting listeners.

The proposal's "voluntary" nature does not alleviate these concerns. As most radio listening occurs in the car, those driving to different parts of a station's market could lose access to emergency updates and other important information as they transition between boosters. Moreover, poor radio service on one or several stations harms the entire industry. If listeners endure routinely dropped radio stations, it makes radio as a whole a less attractive option in today's highly competitive audio market. Finally, larger stations that can actually afford the substantial infrastructure, licensing, and additional power costs can use ZoneCasting to undercut smaller stations that today earn revenue from the outer edges of the larger stations' coverage areas.

Accordingly, I ask that you take these concerns into account as you review GBS's proposal, and any other proposals that would harm local radio. In my incredibly rural district, radio is a lifeline for constituents who have few other reliable options for news and emergency alerts. Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Markwayne Mullin".

Markwayne Mullin  
Member of Congress