



“Legislative Hearing to Address Spectrum and Public Safety Issues”

United States House of Representatives
Subcommittee on Communications and Technology

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Statement of Senator Gordon H. Smith
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Good morning Chairman Walden, Ranking Member Eshoo and members of the Subcommittee. My name is Gordon Smith, and I am President and CEO of the National Association of Broadcasters (“NAB”). NAB is a nonprofit trade association that advocates on behalf of thousands of local radio and television stations and broadcast networks before Congress, the Federal Communications Commission (“FCC”) and other federal agencies, and the Courts.

I am grateful for the opportunity to speak before you this morning about broadcasters’ use of spectrum and public safety. As you are all aware, this is a time of great and rapid change in all sectors of the communications industry, including broadcasting. Two years removed from the transition to all-digital television, local full power TV broadcast stations have embraced digital technology to use their 6 MHz channels more intensively and expand greatly the amount and quality of free television available to local citizens. Because of digital, broadcasters now offer twice as many channels as they did in the analog world while at the same time returning 108 MHz of spectrum for use by others, including the public safety community. They offer programming, for free, in high definition. They are just now bringing highly-anticipated Mobile DTV to market. And these advances are just the beginning. Over the course of the next decade, TV broadcasters will introduce a variety of new ways to provide highly valued information and entertainment to viewers, however and wherever they want it using their efficient one-to-many architecture.

Despite these changes, broadcasters continue to do what they have always done for their local communities. They are still the go-to source for local news. They are still the primary method to alert citizens during emergencies. And they are still the most

viewed medium for addressing issues that impact our lives and neighbor's lives. And no new technology – not the Internet, not the smartphone, not the tablet – has stepped in to replace broadcaster's critical role in this regard.

This is due, in part, to the nature of broadcast delivery. As I will explain more fully, broadcast architecture is a one-to-many model that is infinitely scalable to additional users. This is critical during emergencies, when many people want and need access to the same information at the same time. Compare this to the one-to-one architecture of wireless phone and broadband services, which is susceptible to network failure when traffic surges, as it does during an emergency. It shuts down just when people need it the most. Broadcast technology does not shut down because of traffic surges. It thrives when people need it the most.

As this Subcommittee and Congress move forward with possible incentive auction legislation, we urge you to be mindful of the critical role broadcasters continue to play in the communications ecosystem. Millions of viewers rely on local stations for news, for entertainment, and most germane to this hearing, for their safety when disaster strikes. Spectrum policies, including potential incentive auction legislation, that seriously diminishes the local broadcast service will disenfranchise millions of TV viewers and could well endanger those viewers during emergencies.

To avoid those harms, it is critical that any incentive auction legislation be crafted to ensure viewers who rely on broadcast television continue to receive the service they do today. I want to thank the leadership of this Committee, in particular Chairman Upton and Chairman Walden, for the solid framework incorporated in the discussion draft being deliberated on today. I also want to thank Representatives Dingell and Green who

introduced H.R. 2482, another comprehensive approach to spectrum policy that works to protect households that rely on over-the-air TV. As your colleague Representative Green can attest, 42% of the Hispanic population in Houston relies exclusively on this vital service, while 1 out of 4 Hispanic households nationwide are over-the-air exclusively. Couple this with the approximately 46 million Americans relying solely on this free service, and, clearly, it is essential we get this right.

In the next few weeks and months, as this Committee begins the legislative process to craft balanced spectrum policy, we ask that you not only further consider the impact that spectrum incentive auctions could have on viewers and on emergency communications, but also the significant impact this shift in spectrum policy would have on the future of telecommunications. It is a shift, in part, from a free information service to a paid service. It is the likely shift from spectrum licensed to hundreds of companies to a handful. And it is an irreversible shift from a one-to-many architecture to a one-to-one architecture – potentially impacting our ability to reach citizens with vital emergency information.

I. Radio and Television Broadcasters' Role as "First Informers" Ensures Timely and Continuous Information during Emergencies and Disasters

Broadcasters have long earned recognition for their service during emergencies and disasters by providing the public with effective warnings, and reporting critical information as events unfold. As noted in the FCC's recent *Future of Media* Report, "during emergencies, the local TV station is often considered to be as vital a part of the local community as the police and fire departments."¹ Broadcasters take their role as

¹ Steven Waldman, *The Information Needs of Communities: The Changing Media Landscape in a Broadband Age*, at 79 (June 2011) ("The Future of Media Report").

“first informers” very seriously. In the last few years, local stations’ commitment to emergency services has proven itself time and again as communities across the country have been struck by disaster.

Here are just a few examples:

- A survey conducted of Alabama residents impacted by the tornados that struck in late April 2011 reported that 71% of adults received early warning of the tornados by watching television.² An additional 10% of those surveyed learned of the tornados via radio. A mere 6% of respondents learned of the tornados through Internet, smartphones, or Twitter/Facebook. *Id.*
- As a dangerous storm developed near Springfield, Massachusetts, last month, all three local television stations went wall-to-wall with coverage. In an area not used to tornadoes, the stations captured dramatic images and broadcast them to viewers. Following the storm, the stations continued to report on the damage and recovery and provided information on relief and food supplies.³
- Prior to tornados striking Joplin, Missouri in May, radio station KZRG began wall-to-wall coverage to alert residents about the storm an hour and a half before the twister touched down.⁴ When Internet and mobile connections were unreliable following the tornado, Zimmer Radio, owner of KZRG, broadcast a single feed of continuous disaster coverage on six radio stations. *Id.* Crews drove to the station immediately after the tornado in order to provide information on medical help, the missing, and where residents could buy gas and groceries. *Id.*
- During the blizzards that hit the East Coast in February 2010, which effectively closed down the nation’s capital for four days, broadcasters provided up-to-the-minute information that was critical to affected residents. Washington D.C. station WRC-TV’s wall-to-wall coverage and “potentially life-saving newscasts” were lauded by Maryland Senator Barbara Mikulski, and stations WJLA-TV and WUSA also earned praise

² Alabama Tornado Survey, Billy McDowell, VP of Media Research RAYCOM Media, May 2011.

³ Scott Fybush, “Radio, TV React to Mass. Tornadoes,” *NorthEast Radio Watch* (June 6, 2011).

⁴ Moni Basu, “Radio Stations Chug Along 24/7 in Tornado-devastated Joplin” May 24, 2011, CNN, available at http://articles.cnn.com/2011-05-24/us/missouri.tornado.radio_1_radio-stations-killer-tornado-deadly-tornado?_s=PM:US

for their coverage of the snowstorms.⁵ FCC Chairman Julius Genachowski observed that “not only were local broadcasters a lifeline for the community, WRC-TV used its robust Web site and Twitter feed to help residents who had lost power get up-to-the-minute information through their computers and phones.”⁶

Despite the growth of wireless services, including broadband, broadcasting continues to be relied upon throughout the world as the principle means of communicating with the public before and after disasters. One example from Japan following the devastating earthquake and tsunami in March shows the impact of mobile broadcasting as an alerting mechanism. More than 75 percent of mobile phones in Japan include a mobile DTV chip and the service is actively used by more than 40 percent of the population.⁷ In the moments after the earthquake hit Japan, television stations began broadcasting tsunami warnings. Individuals without access to a television, or who lost power, were able to watch these warnings and other information about the unfolding events via their mobile phones.⁸ As one resident noted: “It’s very convenient being able to watch live TV when the phones are down. Otherwise, we’d have no idea what is going on.” *Id.* And in this country, local television stations remain the leading source for weather information.⁹

⁵ John Eggerton, “As the Snowy World Turns,” *Broadcasting & Cable* (Feb. 10, 2010).

⁶ Prepared Remarks of Chairman Julius Genachowski, NAB Show 2010, Las Vegas, Nevada at 2 (Apr. 13, 2010).

⁷ See Heather Fleming Phillips, “Free is the Key To Mobile DTV Success,” TVNewsCheck (March 9, 2011), available at <http://www.tvnewscheck.com/article/2011/03/09/49663/free-is-the-key-to-mobile-dtv-success>.

⁸ WALL STREET JOURNAL *Live Blog: Japan Earthquake*, March 11, 2011 3:06 AM JST <http://blogs.wsj.com/japanrealtime/2011/03/11/live-blog-japan-earthquake/tab/liveblog/>.

⁹ Radio & Television Business Report, “Poll finds local television is leading source for weather info” (Jan. 4, 2011).

Local broadcasters can also bring another dimension to alerting the public – their newsrooms. Unlike wireless carriers, local broadcasters both create and distribute content. Television and radio stations, located in their viewing and listening areas, are uniquely positioned to provide up-to-the-minute information on emergencies and disasters. Many local television stations employ highly sophisticated weather tracking systems that can provide detailed information on severe weather, including tornados.¹⁰ Thus, while broadcasters applaud and support Congressional efforts to help launch a cell-based warning system, we hope that Congress recognizes that such a system is a complement to, not a substitute for, the information and services provided by broadcasters. No text-based technology with limited space for information or data can replace the extensive and detailed information offered by broadcasters, as well as the reassuring impact of a human voice in emergency situations.

II. The “One-to-Many” Broadcast Architecture Is More Robust Than the “One-to-One” Broadband Architecture for Delivery of Critical Information During Emergencies

Because of the differences in their network architecture, wireless networks are simply not as durable as broadcasting during emergencies. The architecture of cellular network technology – a one-to-one, node-based structure – is ideally suited for interactive communications, but lacks robustness under heavy usage, which typically

¹⁰ Broadcasters’ investments in emergency journalism are significant. See *The Economic Realities of Local Television News – 2010*, attached to NAB Comments in GN Docket No. 10-25 (filed May 7, 2010)(reporting that a single season’s hurricane coverage cost one television station \$160,000 *before* accounting for lost advertising revenue, and that another television station lost 50 percent of its revenue for an entire month following the September 11 attacks because intensive news programming preempted so much regular programming) (“NAB Future of Media Comments”).

occurs in emergency situations. Broadcasting's one-to-many architecture, in contrast, cannot be overwhelmed by increased usage.

When Hurricane Katrina made landfall on August 29, 2005, cellular infrastructure in New Orleans was devastated.¹¹ The few cellular towers that survived were overloaded by residents attempting to make phone calls.¹² When phone networks failed and residents of New Orleans were cut off from the rest of the world, they “huddled around battery-operated devices, seeking comfort and news from the on-air voices.”¹³ During the crisis that followed in the aftermath of Hurricane Katrina, several radio stations were able to continue broadcasting,¹⁴ and television stations WWL-TV and WDSU(TV) continued to broadcast despite the disaster by using transmitters in Baton Rouge, Houston and elsewhere. Less than a month later, Hurricane Rita hit the Gulf Coast, and KLFY, a Lafayette, Louisiana television station, provided continuous live coverage when the path of the hurricane was determined to pose a risk to people in the station's service area.¹⁵

¹¹ Marguerite Reardon, *Why Cell Phone Networks are a Weak Link in a Crisis*, CNET NEWS, Aug. 2, 2007. Available at http://news.cnet.com/8301-10784_3-9754096-7.html.

¹² Tom Conlon, *Bridge Collapse: Why Did Cell Phones Fail?*, SWITCHED, Aug. 3, 2007. Available at <http://www.switched.com/2007/08/03/bridge-collapse-why-did-cell-phones-fail/?feeddeeplinkNum=0>.

¹³ *Good Morning, New Orleans*, NEWSWEEK, Sept. 21, 2005, at 14.

¹⁴ See Reginald F. Moody, *Radio's Role During Hurricane Katrina: A Case Study of WWL Radio and the United Radio Broadcasters of New Orleans*, JOURNAL OF RADIO & AUDIO MEDIA, 16 (2), p. 160-180, at 164 (2009).

¹⁵ See NAB Future of Media Comments at 15.

Similarly, in the hours and days following the recent devastating tornado in Joplin, Missouri, “[t]elephone lines were down” and “[c]ell phones didn't work.”¹⁶ In sharp contrast, local broadcast stations were able to continue broadcasting without interruption. *Id.* And during this spring's deadly tornados in Alabama, Birmingham's television and radio stations remained on the air, and the Birmingham City Newspaper observed that:

Local television was the primary source of news about the rapidly changing afternoon weather patterns [prior to the tornado that hit Tuscaloosa, Alabama]; not social media or text alerts—television. Social media amplified and carried the message, but TV meteorologists brought us the info forward.

Though anyone with a computer can access real-time weather data from most of the same sources as local meteorologist James Spann and company, we often rely on their televised expertise to know when to hide in the basement. Their coverage likely saved hundreds of lives.¹⁷

Why have wireless networks proven to be less robust than broadcast systems during these various crises? The point-to-point architecture of wireless broadband networks essentially means that each user has his or her own path in the cellular network. This type of design allows two people standing next to each other using the same type of device and operating on the same wireless network to access totally different types of information. The first person can be watching a video and the second person can be looking up directions to the closest Chinese restaurant. But, if those two people and hundreds or thousands of other people near them are trying to access the same information at the same time – like they may well during an emergency – the

¹⁶ Jay Scherder, *Radio Station Connects Joplin Tornado Victims After Other Communications Were Cut Off*, KY3 NEWS, May 25, 2011. Available at <http://www.ky3.com/news/ky3-radio-station-connects-joplin-tornado-victims-after-other-communications-were-cut-off-20110525,0,7257538.story>.

¹⁷ Wade Kwon, “Twisters, Twitter, and You,” *Birmingham's City Paper* (May 12, 2011).

wireless network will quickly be overwhelmed. And, no amount of additional spectrum or other redundancy can overcome this issue.

Mobile device connections begin with a link between a user's mobile device and a base station (often a cell tower).¹⁸ These base stations cover a certain geographic area and receive all data transmitted from mobile phones within that geographic area. The base station then transmits the data (in the wireless broadband context, this data is often a small packet requesting data be sent to the mobile phone) to a mobile switching center. The mobile switching center connects the data to a transmission network where the data is sent to its final destination. *Id.* The data requested by the user is then sent through the same transmission network and back through the mobile switching center. From there, the data is sent to a base station that transmits the data to the individual's mobile phone. *Id.*

With this unicast design, a base station needs to send data to every mobile phone individually, even if those phones are accessing the same data (as they would during an emergency). This creates a serious risk of overloading the cell network when too many people attempt to access the network at the same time.¹⁹

In contrast, television and radio broadcasting creates one or just a few data streams and transmits that data over a specific geographic area using a high-powered transmitter. This data can be received by anyone who has a receiver located within the

¹⁸ D. Tipper, S. Ramaswamy, T. Dahlberg, *PCS Network Survivability, Proceedings of the IEEE Wireless Communications and Networking Conference 1999*, New Orleans, LA, Sept., 1999.

¹⁹ See Tom Wolzien, "Homeland Security Depends on Broadcast," *TVNewsCheck* (April 4, 2010)(observing that "broadband circuits – wired or mobile – can clog up and the information-carrying data can't pass" when "many people need something at the same time").

transmission range of that broadcaster. Since there is no uplink or return path in the broadcasting model, no stress is put on the broadcasting network. Therefore, a broadcaster's data stream will continue, uninterrupted, regardless of how many individuals decide to view or listen to the broadcast. Because of this ability to blanket "an unlimited number of users with the same information" simultaneously, without delays or "clogs," it has even been observed that "homeland security depends on broadcast." *Id.*

We note that, theoretically, a cellular network provider could build a system capable of handling the increased cellular and broadband traffic that accompanies emergency situations. Building thousands of extra base stations, mobile switching centers and other excessive redundancies could be sufficient to handle extreme spikes in data requests. However, it is simply not realistic, as a financial or practical matter.²⁰ According to Heidi Flato, a spokesperson for Verizon Wireless in Northern California, it is not practical to build a cellular network for emergency situations.²¹ "To build for that sort of need, for that sort of circumstance, it's like building a second [San Francisco] Bay Bridge just in case the first one falls down," she said. *Id.* Consequently, wireless services, including broadband, will likely remain a supplement to, and not a replacement for, broadcasting during emergencies.

²⁰ For instance, one can only imagine the zoning and environmental issues (as well as the reaction of many members of the public) associated with building thousands of additional base stations and switching centers.

²¹ Todd R. Weiss, *In Emergencies, Can Cell Phone Network Overload be Prevented?*, COMPUTERWORLD, Nov. 5, 2007. Available at http://www.computerworld.com/s/article/9045438/In_emergencies_can_cell_phone_network_overload_be_prevented_?taxonomyId=15&pageNumber=1.

III. No Spectrum Legislation Should Diminish Viewers' Ability to Receive Emergency Information, News or Free Entertainment

As explained above, broadcast technology is, and will continue to be, the optimal method for reaching mass audiences during emergencies. For these reasons, Congress should carefully consider the impact that reallocating spectrum from free over-the-air television to paid cellular networks will have on the ability of citizens to receive emergency information, now and in the future. It should also avoid policies that might limit broadcast innovations that could substantially aid in emergency communications, particularly Mobile DTV.

To ensure that any spectrum incentive auction and subsequent repacking of stations does not disenfranchise viewers, Congress should consider the following four principles when drafting legislation.

1. Preserve viewer access to over-the-air signals by replicating existing station service areas and limiting interference.
2. Do not force broadcasters into an alternative band. UHF stations should stay in the UHF band and no station should be forced into the low VHF band. This is critical for the development of Mobile DTV.
3. Provide certainty to TV viewers and broadcasters by limiting FCC authority to holding only one incentive auction for television spectrum. Multiple auctions would be very disruptive to viewers and would devastate investment in the industry.
4. Hold harmless and make whole those broadcasters that choose not to volunteer for the auction but who must bear the substantial cost of relocating to a new channel.

Let me explain each of these four principles in more detail.

a. Preserve viewer access to over-the-air signals by replicating existing station service areas and limiting interference

First and foremost, viewers should not be disenfranchised. Viewers that receive signals today should receive signals from the same television stations with the same level of service if the FCC repacks remaining stations into a smaller television band following an incentive auction. This means that the service area of repacked stations should be at least as great as those stations had before, and that viewers should not experience any additional interference to their reception of TV signals.

Live, local and free television is especially heavily relied upon by lower income viewers and by Hispanic, African-American and Asian households, who are less likely than the general population to subscribe to pay television services. Any reduction of over-the-air broadcasting would thus negatively affect some of our most vulnerable populations, who could lose access to the services that broadcasters provide, including local news and emergency information.

We also observe that viewership of over-the-air (OTA) television is increasing generally. Knowledge Networks – a well-respected research firm – recently released a survey that shows the number of Americans who rely solely on free over-the-air broadcasts is approximately 46 million -- up by 4 million from just a year ago.²² Much of this increase likely is driven by “cord cutting,” an undeniable phenomenon that finds users, many of them younger than 25, opting for free OTA television, supplemented by IP-delivered video. These cord cutters are able to receive essential programming, like local news and emergency information, without a subscription and, most importantly, for free. Tech-savvy cord cutters recognize that services like Netflix alone cannot support all of their video needs. They want live, local television. They want major sporting

²² Knowledge Networks, Press Release, “Over-the-Air TV Homes Now Include 46 Million Consumers” (June 6, 2011).

events including the Olympics and the Super Bowl. And they want high-quality network programming. Many are surprised to find that they can get it all with just an antenna. Together, over-the-air TV and online services represent a strong competitor to increasingly expensive cable and satellite providers.

Given the demographics of cord cutters, this trend should continue for some time, unless incentive auction legislation allows the FCC to decrease broadcast service areas and effectively forces some viewers to use paid services. We urge Congress to protect all viewers who rely on OTA television by ensuring that any spectrum reallocation does not decrease broadcast service areas or increase interference.

b. Do not force broadcasters into an alternative band or to share channels with other broadcasters

To ensure that local television viewers benefit from the \$15 billion digital transition going forward, Congress should ensure that no station is forced to share a channel with another station or required to move to a channel in a different band. In other words, stations operating currently in UHF should continue to do so. Likewise, no station operating as a high VHF station (channels 7-13) should be forced onto a low VHF channel (channels 2-6). If possible, however, those VHF stations should be permitted to move to UHF channels.

To provide a viable product that will satisfy consumer needs, broadcasters must have access to spectrum free of signal interference. If, as part of the television band reallocations, stations are moved from the UHF band to the VHF band, the deployment of mobile DTV will be severely limited. It is well established that operating Mobile DTV in the VHF band is very challenging and virtually impossible in low VHF where ground

noise causes harmful interference.²³ In light of the role that Mobile DTV has played in recent emergencies in other countries, such limitation on the deployment of Mobile DTV would not be in the public interest.

Beyond its clear role in emergency communications, Mobile DTV is also a product that consumers desire for entertainment and news. According to a 2009 study, 88 percent of consumers are interested in watching local news and information on a mobile device.²⁴ More and more, consumers are looking for opportunities to watch their favorite programming wherever they are and on whatever device they choose – on their phones, in their cars, on their tablets. Mobile DTV will fill that demand without taxing existing or future wireless broadband networks. As more wireless companies end unlimited data packages, it is likely that consumers will shy away from data-heavy uses like video delivered through wireless networks. Mobile DTV services will be there to fill that void with news, high-quality entertainment programming, on-the-go weather and sports, and more – all without the threat of an unwelcome surprise on a consumer’s wireless bill.

Additionally, other proposals, such as forced channel-sharing or spectrum fees, would negatively impact broadcasters’ ability to provide mobile and other services. Limiting broadcasters to 3 MHz or less of spectrum per station would require them to make the Hobson’s Choice between providing a proper high-definition primary channel

²³ See *Innovation in the Broadcast Television Bands: Allocations, Channel Sharing and Improvements to VHF*, Notice of Proposed Rulemaking, ET Docket No. 10-235, 25 FCC Rcd 16498 at 16512 (Nov. 30, 2010).

²⁴ See Frank N. Magid Associates, Inc., *The OMVC Mobile TV Study: Live, Local Programming Will Drive Demand for Mobile TV*, available at www.openmobilevideo.com/_assets/docs/press-releases/2009/OMVC-Mobile-TVStudy-December-2009.pdf.

with no mobile DTV feed and a standard definition primary channel with perhaps one mobile DTV feed. Channel sharing would also clearly inhibit the ability of local stations to multicast additional streams of free OTA programming, including content specifically targeted to diverse and niche audiences.²⁵ In short, such a limitation will severely limit broadcasters' opportunity to develop a market for mobile or multicast services, to compete against other video services likely to be offered by wireless providers, and to provide important emergency alerts and information via mobile DTV services.

c. Provide certainty to TV viewers and broadcasters by limiting the FCC's authority to hold only one incentive auction of television spectrum

To minimize disruptions to viewers and to provide some economic certainty to the broadcast industry, Congress should allow the FCC to hold only one incentive auction of broadcast spectrum. Multiple auctions could severely undermine broadcasters' ability to attract capital for long-term investment, and could result in continuing disruption for viewers if stations are moved multiple times. Stability is also important to promote further innovation. Long-term planning requires that broadcasters and high tech companies that invest and build broadcast technology have confidence in the future of the industry and, specifically, that TV broadcasters will have interference-free spectrum to provide new services to their viewers. The threat of multiple auctions will undermine that confidence, and in turn, limit innovations in the broadcast band.

²⁵ As of the end of 2010, television stations were offering 142 Spanish-language network-affiliated multicast channels. See Justin Nielson, "TV Stations Multiplatform Analysis '11 Update: Multicasting Expands Programming Options, Mobile DTV Goes Live," *Broadcast Investor* (SNL Kagan) (Jan. 27, 2011). And broadcasters are continuing to roll out new services, such as Bounce TV, a new multicast network aimed at serving African-American audiences.

d. Hold harmless and make whole those broadcasters that choose not to volunteer for the auction but who must bear the substantial cost of relocating to a new channel

Congress should consider the economic impact of any potential reallocation on stations that do not participate. The FCC has indicated it will “repack” broadcast stations after an incentive auction. While an incentive auction may be a voluntary process, repacking is not. This means that some stations will be forced to move to new channel locations just two short years after expending millions of dollars to convert to all-digital broadcasting. Another relocation would be very expensive for some stations, requiring the purchase of new transmitters and other equipment, and could result in the temporary loss of service to consumers. Auction revenues should be used, in part, to cover those costs. Compensating licensees disrupted by relocation is consistent with past FCC practice.

If broadcasters that choose not to participate in a voluntary auction are forced to pay for relocation to new channels – costs that could be higher than \$4 million for some stations²⁶ – viewers will suffer from reduced investment in broadcast programming and services, including local news and weather. This result is not in the public interest.

IV. Conclusion

As always, I appreciate the opportunity to speak before this Subcommittee and provide broadcasters’ views on an issue that is critical to the future of American telecommunications. A potential spectrum auction is one of the most significant issues that has faced television broadcasters in the history of the service. As you can imagine,

²⁶ See Testimony of Robert Good, Assistant General Manager, Director of Operations, and Chief Engineer, WGAL-TV, Lancaster, PA, Before the House Energy and Commerce Committee, Subcommittee on Communications and Technology at 10 (Apr. 12, 2011).

many broadcasters fear what this could mean for their business and for the industry. Perhaps more important is the voice we are not hearing from today – the millions of viewers that rely on local television for their news, information, emergency alerts and more. I respectfully ask that this Subcommittee consider how any incentive auction will affect them. As we learned from the DTV transition, if we do not get this right, and viewers lose access to local television stations, you can be sure that group will not remain silent for long.

I look forward to answering any questions you may have.

Thank you.