



March 3, 2023

The Honorable Jessica Rosenworcel  
Chairwoman, Federal Communications Commission  
Washington, D.C. 20554

Dear Chair Rosenworcel,

Thank you for your service to our nation.

I am writing today on behalf of our membership and the unique industry space they represent, to express the view of the National Religious Broadcasters (NRB) association regarding the transition to the ATSC 3.0 broadcasting standard.

NRB is a non-profit membership association headquartered in Washington, D.C. that represents the interests of Christian broadcasters throughout the nation. Since 1944, the mission of NRB has been to help protect and defend the rights of Christian media and to ensure that the channels of mass media communication remain open and accessible for Christian communicators. Our membership includes non-profit, for-profit, commercial, and noncommercial radio and television broadcasters across the United States.

ATSC 3.0, known commercially as NextGen TV, is the gold standard for over-the-air (OTA) programming. This standard boasts two-way interactivity, multi-screen applications, higher resolution, immersive audio, and much more by combining broadcast TV with broadband internet. Broadcasters are already using this new technology to deliver a cutting-edge end user experience: ATSC 3.0 stations are currently available in some 68 markets covering 60 percent of U.S. homes. However, several years since the standard was approved by the Commission, a full transition to the new standard is stalling, which carries serious risks for the future of the television broadcasting industry.

This issue impacts around a dozen of our members. Within the NRB, most of our television industry members are non-commercial, non-profit organizations with very lean budgets.

Madeleine Noland, President of the Advanced Television Systems Committee (ATSC), described the costs of ATSC 3.0 deployment in a 2021 panel. An article from the *TV Tech* publication reported:

Making a single site with a newer transmission plant ATSC 3.0 capable would cost about \$300,000, Noland reports. For older single sites, the price tag depends on how much tower work is needed—if minimal, it could be around \$600,000; for significant tower work the cost could jump to \$3 million. Also, if working to get a single frequency network (SFN) ready for ATSC 3.0, the cost would be around \$4 million.<sup>1</sup>

As an association that represents the interests of small, local, independent, and religious broadcasters, we have observed the ATSC 1.0 and 3.0 dual transmission requirement to be both financially wasteful and unsustainable for small broadcasters. Our membership includes broadcasters who are otherwise prepared to make a full migration to ATSC 3.0 but are priced out by the dual transmission requirement. Not only is dual transmission a complicated and costly standard for independent broadcasters to maintain indefinitely, but simulcasting leaves broadcasters with too little bandwidth to provide services like ultra-high-definition TV, which plays a vital part in stimulating consumer interest in NextGen TV. This puts broadcasters at risk of losing high-value content—and viewership—to streaming platforms that can deliver a more attractive viewer experience. A plan to sunset the five-year dual transmission requirement and complete the

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<sup>1</sup> <https://www.tvtechnology.com/news/noland-details-atsc-30-transition-costs-for-public-tv-stations>



transition to ATSC 3.0 is overdue. We respectfully urge you to review and assess the dual transmission requirement for the financial burden it places on non-commercial, non-profit entities.

Let us be clear: An overly prolonged transition would be a failed transition, and may prove fatal for OTA television broadcasting, particularly for smaller broadcasters. We recognize that a full, timely transition to ATSC 3.0 requires cooperation from multiple industry sectors. Regulators must work to ensure an innovation-friendly regulatory environment, broadcasters must make their audiences aware of the benefits of NextGen TV, and consumer electronics manufacturers must both include ATSC 3.0 tuners in new television sets and provide cost-effective peripherals (tuners and converter devices). The reality is that the uncertainty of dual transmission issue disincentivizes manufacturers from bringing affordable 3.0 peripherals and receivers to the market, and creates too much complexity, confusion, and cost for customers, who would have to program 1.0 and 3.0 channels separately to utilize both. If a full migration to ATSC 3.0 is realized, the market will self-adjust, and manufacturers will have sufficient incentives to provide low-cost solutions for customers who receive their signals over-the-air.

Broadcasters cannot make this transition succeed alone, and it is crucial that this Commission signal its support for a full and timely ATSC 3.0 transition. We concur with the recommendation of our colleagues at the National Association of Broadcasters (NAB) that a dedicated task force is the ideal forum to address the foregoing concerns and clear the path to full implementation of ATSC 3.0 of bureaucratic obstacles.<sup>2</sup>

We look forward to seeing the broadcasting industry and American consumers reap the benefits of the ATSC 3.0 standard, which heralds new revenue streams for broadcasters, new opportunities to deliver our members' mission-driven content directly to consumers, and an improved experience for all Americans who rely on television as a source of free, local news and information.

Sincerely,

Troy A. Miller  
President & CEO

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<sup>2</sup> See Letter from Rick Kaplan to Marlene H. Dortch, Secretary, FCC, MB Docket No. 16-142, at 2 (Jan. 25, 2023) (expressing that each FCC Commissioner should use their platform to demonstrate the agency's commitment to ATSC 3.0 and that the Chairwoman should establish an ATSC 3.0 task force within the Commission)