

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)
)
Authorizing Permissive Use of the “Next)
Generation” Broadcast Television Standard) GN Docket No. 16-142
)

Comments on the Further Notice of Proposed Rulemaking by

Americans for Tax Reform
Americans for Prosperity
Digital Liberty
Competitive Enterprise Institute
American Commitment
Citizens Against Government Waste
Taxpayer Protection Alliance
Center for Individual Freedom
Institute for Policy Innovation
Pelican Institute
Citizen Outreach
American Business Defense Council
Jersey 1st
James Madison Institute
Innovation Economy Alliance
Mackinac Center for Public Policy
American Legislative Exchange Council
Institute for Liberty
Frontiers of Freedom



AMERICAN COMMITMENT



Thank you for the opportunity to provide further comments on proposed "Next Generation" Broadcast Television Standards.

We, the undersigned organizations, **urge the Federal Communications Commission to reject any adoption mandates for Next Generation Television.** With broadcasters operating under the strain of onerous regulation dating from the Second World War, new mandates on them or device manufacturers are not the solution.

Video accessibility is a noble goal, and one that the market has already demanded thanks to the purchasing power of those in need. Next Gen TV is already operating with advanced 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. 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.**

The Commission should take the plight of broadcasters and those in need of accessibility features seriously. The solutions lie in deregulatory efforts, such as those the Commission is successfully pursuing through Delete, Delete, Delete that make their technologies cheaper and more widely available to consumers. They also 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.

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

Sincerely,

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