

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
International Comparison and Consumer)	GN Docket No. 09-47
Survey Requirements in the Broadband)	
Data Improvement Act)	
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Fostering Innovation and Investment)	GN Docket No. 09-157
In the Wireless Communications Market)	

**WRITTEN EX PARTE SUBMISSION OF
THE CORPORATION FOR PUBLIC BROADCASTING**

The Corporation for Public Broadcasting (“CPB”)¹ hereby provides this written ex parte presentation in the above-referenced proceedings. CPB appreciates its recent opportunities to meet with Blair Levin, Executive Director of the Omnibus Broadband Initiative, and members of his task force and to share its visions for public media—in particular, the nation’s public television and radio licensees—in the context of the National Broadband Plan and beyond.

As guardian of the purposes and goals of public media for nearly half a century, CPB strongly supports the Commission’s efforts to create a National Broadband Plan. We are confident that public media’s content and mission will flourish as more Americans reap the benefits of broadband. The recent Knight Commission Report notes that we are “at the beginning of a democratic renaissance” and the cusp of “a brilliant age” nurtured by powerful technologies such as broadband. However, CPB firmly believes that only if the broadband

¹ CPB is a private, nonprofit corporation created and authorized by the Public Broadcasting Act of 1967 to facilitate and promote a national system of public telecommunications. Pursuant to its authority, CPB has provided millions of dollars in grant monies for support and development of public broadcasting stations and programming. *See 47 U.S.C. § 390 et seq.*

initiative, a robust “upstream” infrastructure, is linked to locally-based “downstream” institutions (especially public broadcasters), values, and activities, will both the National Broadband Plan and those local efforts be able to reach their full potential.

The influence of public broadcasting is already visible in millions of ways each day, as citizens are informed by *PBS NewsHour* and National Public Radio (NPR), children learn to read from *Sesame Street* and *SuperWhy!*, educators get help with lesson plans and teaching tools, stations host town-hall meetings to discuss local issues, and first-responders use public telecommunications systems to provide more effective service. To public media, ubiquitous broadband offers the promise of new collaborations to enhance news reporting; virtual field trips and high-definition conferences that bring the world to students in rural areas; innovative ways to connect people to examine and solve local problems. And to the National Broadband Plan, public media offers the opportunity to achieve widespread access to and utilization of the new digital resources enabled by broadband.

Public broadcasting’s national organizations have previously filed several documents in this proceeding addressing how they are fully utilizing their broadcast spectrum and other platforms to advance their public service mission and address national priorities.² This letter is intended to provide supplemental information and context on how public media can play an integral role with respect to the three prongs of the National Broadband Plan: improving broadband access and infrastructure; increasing adoption of broadband; and utilizing broadband to serve national purposes.

² See, e.g., Comments of the Association of Public Television Stations (APTS), CPB, and the Public Broadcasting Service (PBS) on Spectrum for Broadband (filed Oct. 23, 2009); Comments of PBS on the Role of Broadband in Education (filed Dec. 11, 2009); Comments of PBS, CPB and APTS on Uses of Spectrum (filed Dec. 22, 2009).

In addition, we offer several recommendations for the Commission to help assist public media in achieving its promise as an invaluable partner in this endeavor:

- Expand public media eligibility for existing sources of funding, including the E-Rate Program.
- Support public media's need for stable, long-term sources of increased federal funding to enable delivery of public media content on diverse platforms to all Americans.
- Implement and maintain policies that facilitate the development of mobile digital television.
- Recognize the importance of broadcast delivery to the preservation of public media's universal service mission.
- Recommend that the benefits enjoyed by public media under the copyright laws are revised to reflect the realities of the digital age.

I. PUBLIC MEDIA'S VALUES

Throughout our nation, public media engages citizens on-air, on-line, and on the ground with information they can use to improve their lives and strengthen their local communities.

Public media entities create high-quality content, optimized for a variety of platforms, universally accessible and free from commercial pressure, that informs, educates, and inspires its users and cultivates and sustains our civil society. While commercial media becomes increasingly consolidated, a key strength of the public media platform remains its design: a decentralized collection of stations, each with deep local roots and maintaining individual service strategies tailored to the unique needs of its local community.

Public broadcasting was born in an earlier moment of profound change and transition. In the 1950s and into the 1960s a new media technology was diffusing quickly: the television. Around it grew a movement to use the new medium for educational purposes, and so educational television was born. By the mid-1960s, a visionary group of leaders from the Carnegie and Ford Foundations, the Congress, the Johnson administration, and the education community came to

understand that the new media could and should transcend educational television. They called this new realm “public broadcasting,” and legislation governing it was signed into law by President Johnson in 1967.

Today, more than 40 years later, we are making a similar transition from “public broadcasting” to “public service media 2.0,” recognizing the growing convergence of radio, television, and new digital media. In this new “1967 moment,” We are building on the hard-earned trust and goodwill of the American people to become more diverse, networked, technologically nimble, innovative, and focused on serving the needs of our changing nation. As public media continues to evolve from broadcast-only to multi-platform, we will increasingly act as curators and connectors. We will increasingly utilize broadband and other technologies, as well as the broadcast spectrum licensed to colleges and universities, state and local governments, and community organizations, to work directly with people and organizations to circulate information and catalyze community dialogue.

As we leverage our legacy to become a leader in the new media ecosystem, public media has focused its efforts on what we term the “Three Ds”: Digital, Diversity, and Dialogue.

A. Innovation on DIGITAL Platforms

As an outgrowth of its dedication to universal service, public media is embracing a range of digital delivery methods to reach all Americans, wherever and whenever they seek information.

Because of its broad reach and unmatched efficiency in point-to-multipoint communications—for example, a State of the Union address—over-the-air service remains an essential part of the public media portfolio. On the heels of a multi-billion-dollar infrastructure investment in digital broadcasting—funded in large part by the American public—local public

broadcasters are maximizing their over-the-air digital capabilities to deliver multiple streams of programming and other advanced services, including mobile video.

At the same time, public broadcasters are evolving into true multi-platform public media entities by creating content and services, some related to and some entirely independent from broadcast content, that capitalize on the unique benefits of broadband. Broadband provides opportunities for interaction between and among producers and users that makes content more accessible and useful to more people. For example:

- WPBT, a public television station in South Florida, has developed **uVu**, a community video website and companion digital broadcast. The website features video content created and submitted by individuals, community groups, and cultural/educational institutions. Many of the most-watched on-line segments are later distributed on WPBT's broadcast channel, and local broadcast programming is also available on-line.
- Public Broadcasting Atlanta is developing **Lens on Atlanta**, an on-line portal that not only allow citizens to create and participate in blogs, wikis, forums, petitions, and surveys, but will also engage institutions and government entities around Atlanta to listen and participate.
- Many public radio stations have expanded the reach of their cultural programming by investing in and creating substantial internet music services with significant audiences. Examples include WAMU's **Bluegrass Country**, WKSU's **Folk Alley**, WXPB's **Xponential**, and KCRW's **Eclectic24**.

In addition to these local station efforts, public broadcasting's national organizations for some time have been moving to leverage the power of broadband media. For example:

- CPB is currently funding a pilot program for the **American Archive**, which ultimately will restore, digitize, and preserve public broadcasting's deteriorating collections of local television and radio content. The archive will hold past, present, and future content and will be accessible to educators, students, historians and the general public.
- In October 2009, NPR initiated **Argo**, a new multi-media journalism project. Funded by CPB and the Knight Foundation, the two-year project is designed to strengthen public media's local journalism, build a significant online audience, and develop a common technology infrastructure that will better support public media's online needs. NPR will work with a dozen selected PBS and NPR stations to launch websites for each station

that go in-depth on selected topics or “verticals.” A diverse group of reporter/bloggers at each station will lead the content creation. The sites will be powered by a shared platform, including a common set of tools and content repository. The *PBS NewsHour* will contribute its embeddable video player and will promote the websites on the air. The goals are to help fill a growing gap in local news offerings and to begin to establish what NPR CEO Vivian Schiller called an online “news powerhouse of unparalleled depth and quality.”

- PBS is developing **COVE**, the Comprehensive Online Video Ecosystem, which creates a holistic approach to offering on-line video throughout the PBS network by providing the infrastructure necessary for local stations and national producers to serve and share content. The backbone of COVE is an asset management and publishing system known as the Platform, which allows stations and producers to add media content and syndicate it throughout the COVE network. COVE Lite, a plug-and-play video player, is now available to all PBS stations.
- Founded by 11 public radio stations, the **Public Radio Exchange (PRX)** leverages the flexibility of broadband to provide an inexpensive distribution service for independent producers. Any radio station, distributor, or producer can add work to the PRX catalog of documentaries, series, commentaries, and features. The pieces can be streamed on-line, and stations may buy them for a royalty fee, which is given to the producer.

B. Content that Reflects the Nation’s DIVERSITY

Equally central to public media’s universal service mission is providing individuals of every ethnicity and economic and social background, particularly those that are unserved and underserved by commercial media, with relevant and engaging content. The ability to transmit multiple streams of digital programming over the air, combined with the nearly boundless capabilities of broadband, enable local and national public media entities to deliver content that, in subject matter and pedigree, truly reflects America’s diversity.

CPB is constantly expanding its relationships with diversity partners to broaden the reach of public media and allow greater opportunities, on a variety of platforms, for underrepresented groups. Each of the groups we mention is making extensive use of broadband channels to expand the impact of its service.

- CPB funded the creation of **Native Public Media** in 2004 to build and advance Native access to, ownership of, and participation in media—ensuring the presence of public media on tribal lands. In an unprecedented joint effort, in November 2009, Native Public Media and the New America Foundation’s Open Technology Initiative released *New Media, Technology and Internet Use in Indian Country: Quantitative and Qualitative Analyses*. The comprehensive study takes the first step in raising national awareness of the deplorable state of broadband in Native communities, and provides the foundation for tribal communities to be recognized in the discussion of broadband expansion.
- CPB provides ongoing support to, among others, the **National Minority Consortia**, which provides seed money to producers of multicultural content; the **Independent Television Service (ITVS)**, which champions independently produced programming that serves underserved audiences; **Koahnic Broadcast Corporation**, the leader in bringing Native voices to Alaska and the nation through the only urban Native public radio station and its national production and distribution center (Native Voice One) in Albuquerque; and **Radio Bilingue**, the only national distributor of Spanish-language public radio programming, which is now developing a transmedia service in Los Angeles targeting an English-speaking, young, and highly diverse audience.
- Through projects such as the Public Radio Talent Quest, CPB has sought to identify a new generation of public broadcasting talent—**Public Service Media 2.0** producers—who appeal to new audiences and produce multimedia content for a variety of platforms. For example, Glynn Washington, a winner of the Talent Quest, produces a new multimedia series, Snap Judgment, that combines his unique brand of storytelling with innovative technology to explore the decisions people make in moments of crisis. In addition to audio, the series has spawned video, a web presence, a stage show, a magazine, and an iPhone application.

C. Services that Foster DIALOGUE Between Public Media and the American People

Public media’s localism remains evergreen—indeed, more relevant than ever as commercial media are increasingly owned and operated by entities outside of their local communities—but the nature of our service to local communities is shifting in the digital age.

Critical to public media’s future will be its ability to collaborate and serve as an active resource and trusted partner to more diverse communities, in new ways. Public media entities are quickly adapting to the new paradigm. For example, KETC in St. Louis, through its multi-platform program “Facing the Mortgage Crisis” and coordinated outreach with 26 community organizations, mobilized a community facing double-digit increases in foreclosure rates and

helped to connect those in need with those who are able to help. Many of the services provided by KETC and its partner institutions were delivered through broadband channels, and broadband capability was essential to the ability of the partner organizations to coordinate their work.

II. PUBLIC MEDIA AND THE NATIONAL BROADBAND PLAN

As the Commission finalizes its National Broadband Plan, we urge it to recognize both the potential opportunities and potential implications that the three prongs—improving broadband access and infrastructure; increasing adoption of broadband; and utilizing broadband to serve national purposes—have for public media.

A. Improving Broadband Access and Infrastructure

In the area of infrastructure rollout, CPB suggests that the Commission’s visionary thinking in certain areas could assist public media in fully realizing its potential in a multi-platform world:

- **Public Media as Anchor Institution.** As the administration has noted, ensuring high-speed connectivity for anchor institutions is essential to drive economic growth in communities and stimulate the development of last-mile broadband services. We urge the Commission to recognize explicitly that public media organizations are “anchor institutions.” As much as hospitals, schools and libraries, public media organizations are part of the fabric of their local communities, with longstanding ties to local citizens and community organizations. From town hall meetings to teacher training workshops to local programming, public media organizations structure their services to meet the singular needs of their communities. High-speed connectivity enables public media organizations to cooperate more effectively with each other, as well as with other anchor institutions, in the creation and delivery of educational, news, public affairs, and cultural programming and services. Public media stations are able to become peering institutions with local networks, enabling truly synchronous collaboration. Several public television licensees, including Utah Education Network and the Hampton Roads Educational Telecommunications Association in southern Virginia, have become the anchors of high-speed broadband networks that conduct advanced educational content and services to and between local schools, universities, and libraries. Finally, many local public broadcasting stations are essential partners in local disaster recovery and homeland security plans. For example, in 2007 when San Diego suffered devastating forest fires, KPBS, despite losing its own radio transmission facilities, used Twitter to provide much needed updates to local residents fearing for their homes. VegasPBS uses datacasting to provide “just in

time” building plans and other essential information to first responders in fires and other emergencies. And Louisiana Public Broadcasting served as a central production and transmission facility for New Orleans stations displaced by Hurricane Katrina.

- **Revisions to E-Rate Program.** With a few small changes, the Commission can redirect an existing funding source in such a way that it significantly advances the Commission’s deployment goals. First, the Commission should direct a larger share of E-Rate funding to broadband services. Second, the Commission should provide E-Rate reimbursement for local anchor institution networks, including those providing high-speed broadband among public media organizations and between public media organizations and other anchor institutions. Third, the Commission should increase funding to anchor institution networks by raising the \$2.25 billion cap and by providing support based on actual costs.
- **Delineating High Minimum Speeds.** As Chairman Boucher noted in his December 7, 2009, letter to Chairman Genachowski, the real future is in substantially higher Internet speeds—at least 50 megabits downstream—and higher capacity networks, and only through such levels of speed can the promises of broadband become a near-term reality. At CPB, we have observed the possibilities in the realm of education, through an exchange between students in Lafayette, Louisiana, and San Francisco. On a municipally owned 100-megabit high-speed fiber-optic network, students in Lafayette can communicate in real time, on high-definition screens, with participants across the country in a youth training program at Bay Area Video Coalition, which is also connected to a high-speed network. On a broader scale, such networks, as well as similar networks connecting schools to other anchor institutions, including public media entities, could revolutionize the way students learn and truly democratize digital content creation. Furthermore, such high-speed wireline connections would greatly diminish the need for bandwidth-hogging wireless connectivity.

B. Increasing Adoption of Broadband

Many stakeholders have recognized that the development of innovative on-line content and applications will play an important role in stimulating widespread demand for and adoption of broadband. Further, public media’s widely accessible broadcast services play an essential role in driving adoption of broadband by underserved populations. Accordingly, CPB urges the Commission to recognize the unique role public media can play in stimulating broadband adoption through its status as a leader in multi-media content advancing journalism, education, and community engagement.

- **Journalism.** With stalwart newspapers closing and too many media outlets focusing on sensationalism and polarization of opinion, public media is making every effort, with limited funding, to become the standard bearer of serious, fact-based journalism. On their own and in collaboration with other stations and new media entrants, public broadcasters are developing and growing multi-platform journalism initiatives.

WHYY in Philadelphia has invested more than \$1 million to develop a Health+Science Desk. Recognizing that it serves one of the nation's centers for health care and the life sciences, WHYY is staffing the Desk with four full-time journalists dedicated to delivering health and science-related stories on the internet, television and radio. The station looks to its Health and Science Advisory Committee, which includes leading doctors, professors, and heads of health care businesses and foundations in the community, to help inform its work.

Through a grant from CPB, twelve public media organizations, including NPR, the *PBS NewsHour*, and local stations, have formed a collaboration to serve the public's need for comprehensive, thoughtful editorial coverage of wide-ranging stories on the American economy and its global implications. The partners are producing multimedia content, including audio, video, blogs, podcasts, widgets and more, that are available to all public broadcasters and to the public at www.economystory.org. One goal is to bring the voice of the public into stories and create a space for opinions, ideas, and innovation on a subject that is touching all Americans. The collaboration brings broad economic news to life with features like Marketplace Whiteboard (<http://www.economystory.org/partner-projects>).

Youth Media International (Youth Radio) and social networking company Context Optional, launched the CPB-backed "Stop Me From Spending" Facebook application, aimed at giving young people a way to encourage each other to be more thoughtful spenders. Youth Media International approached its first venture in application development by collaborating with young people to create the Temptation Converter, a composite tool that allows users to enter "tempting" items, select price and category, upload a picture, and immediately translate these temptations into more reasonable ways to spend money. Friends may post temptations on each other's walls and help each other make better spending decisions.

And Minnesota Public Radio's Public Insight Journalism project, created in 2006, has developed a network of more than 75,000 people with verifiable expertise in particular subjects that helps MPR get beyond the usual sources and strengthen its news coverage. Project participants are also invited to public insight meetings across the state where community issues are discussed and feedback is sought. The model has been rolled out to other public media partners throughout the country. The use of a wider range of public sources has clearly strengthened public media's capacity for producing deeper, more high-quality journalism that presents new voices and a greater diversity of viewpoints.

- **Education.** Public media has long been a leader in education, supporting effective teaching and learning through unparalleled access and reach, quality programming, and effective local and national partnerships. With the growth of broadband, public media entities are continuing to assert their preeminence by creating on-line content that enhances the learning experience and bridges in-school and out-of-school learning.

For example, developed by Boston public television station WGBH from high-quality, critically acclaimed and trusted sources such as *NOVA* and *A Science Odyssey*, the free Teachers' Domain collections currently house more than 2,000 standards-based digital resources in all content areas for students and teachers. With more than 333,000 registered users in more than 177 countries around the world, Teachers' Domain (www.teachersdomain.org) features video and audio segments, Flash Interactive, images, explanatory articles, lesson plans for teachers, and student-oriented activities. Teachers' Domain has also developed online professional development courses that assist K-12 science teachers in effectively teaching inquiry-based science utilizing media from the collections.

KQED in San Francisco has created QUEST, a multimedia series about the people behind Bay Area science and environmental issues and how their work is changing the way Bay Area citizens live. The nucleus of QUEST is its website, which makes available all television and radio broadcasts, as well as web-only segments. Unique features of the site include an interactive map created with Global Positioning Satellite technology to "geotag" locations and images where QUEST segments were recorded; on-line "Explorations"—nature hikes and walks; a new community science blog with daily contributions from scientists, experts, teachers and students; and discussion groups and photo sharing. The Quest Education Network (EdNet) offers guides, workshops and activities, all available for free download.

Thinkport (www.thinkport.org), developed by Maryland Public Television, aims to harness digital technology to help teachers teach more effectively, inspire students to learn, and build bridges between schools and homes. For example, through "Think Classroom," one of Thinkport's four distinct "experience channels," teachers can utilize a Lesson Builder to help create lessons that utilize rich multimedia content, and take students on Online Field Trips. Thinkport also enables teachers to store resources for future use and facilitates teacher-to-teacher discussions and sharing over the Internet.

Arkansas Educational Television Network is not just a partner with its state education system; it is an essential provider of educational services to teachers and students. With a forty-person full-time staff in its education department, AETN is the primary provider of in-service training and accreditation in Arkansas and an essential provider of support materials for teachers to use in the classroom. Much of this support is provided over broadband channels.

- **Community Engagement.** Public media entities, in many cases the last locally-owned media outlets in their communities, are capitalizing on their local presence by establishing themselves as indispensable community assets, authentically engaged with their communities to address pressing local issues and improve community life. With the growth of broadband, these efforts are taking on added dimensions and reaching new participants.

For example, Nashville Public Television’s *Next Door Neighbors* project highlights the city’s status as a destination city for immigrants and refugees over the past ten years. Through a series of a project website, on-line community forums, four documentaries, screenings, and literacy outreach, NPT is providing residents with a wide-ranging view of the region’s rapidly growing foreign-born communities, including Kurdish, Somali, and Bhutanese immigrants.

WTIP, a small public radio station in rural Minnesota, recently began holding off-air convenings to discuss the topics it addressed in its civic affairs program *First Thursday*. After a *First Thursday* show on broadband access—a rare commodity in the area—about 30 citizens attended the follow-up conversation. The discussion created “buzz” in the community and inspired the county commission to launch a feasibility study about creating countywide broadband access.

And in an effort to increase the use of broadband by minorities and senior citizens, the National Black Programming Consortium (NBPC) is developing a new national service, Public Media Corps. In partnership with public television and radio stations, community-service organizations, and other partners, NBPC is launching a two-year program that will employ 200 fellows from diverse backgrounds to use social media in innovative ways to link persistently underserved communities to new technologies. Various community engagement strategies will be used to promote the benefit of broadband use to the target audience, which includes senior citizens, African Americans, Latinos, Asians and Pacific Islanders, and Native Americans.

C. Utilizing Broadband to Address National Purposes

The focus on using broadband to advance purposes of nationwide importance is well-placed. However, CPB urges the Commission not to overlook the critical role that local initiatives play in engaging individuals. Our nation is among the most diverse in the world, and there are no one-size-fits-all solutions to the challenges we face. Universal broadband will diminish geographic barriers, but it will not lessen citizens’ need and desire for information and resources tailored to their specific needs and focused on their specific communities. Public media organizations, with their deep roots in local communities and strong ties with community

organizations, are ideally suited to continue a focus on localism even as they adapt to the new, multi-platform environment.

This formula—a locally focused, multi-media effort to achieve goals of national proportion—is already achieving success for public media in the realm of education. Ready to Learn, funded by the Department of Education and part of a cooperative agreement between CPB and PBS, is a national initiative to increase literacy skills for low-income children ages 2-8. National programming and on-line resources are complemented by a broad network of locally developed, locally focused outreach.

For example, KUED in Utah, which has the highest percentage of preschool-age children in the nation but no state-funded pre-kindergarten education, conducts more than 100 workshops each year to train adults to regularly use and enhance the value of Ready to Learn programming and on-line content with young children, particularly those at risk. These “literacy workshops” address a wide variety of early childhood education issues, including child development, cultures, health care and hygiene, media literacy, and nutrition.

III. WHAT PUBLIC MEDIA NEEDS

These are challenging and uncertain times. While Americans have unprecedented access to information through countless platforms, now more than ever, they need trusted entities that can inform the citizenry, serve local communities, and prepare children to solve the problems looming before us. Public media is becoming more, rather than less, essential in our new, vast media ecosystem.

However, public media will not be able to achieve its promise of providing trust, high-quality information to all Americans, how, where, and when they want it, without additional resources and action from the Commission and others. Thus, CPB asks the Commission to take

the following steps so that public media may most effectively partner with it in pursuit of the goals of the National Broadband Plan:

A. Expand Public Media Eligibility for Existing Sources of Funding, Including E-Rate Program.

CPB requests that the Commission explicitly recognize public media organizations as “anchor institutions” in connection with E-Rate and other Universal Service Fund programs, direct a larger share of E-Rate funding to broadband services, and provide E-Rate reimbursement for local anchor institution networks, including those providing high-speed broadband among public media organizations and between public media organizations and other anchor institutions.

B. Support Need for Stable, Long-Term Sources of Increased Funding for Public Media.

With the transition to all-digital broadcasting and the steadily increasing availability of broadband in communities, public media entities are increasingly focused on creating new digital content and services to be distributed over that broadcast and broadband infrastructure. We are starting to realize the great potential that optimal spectrum utilization and digital technology allow, but we also recognize significant additional funding is necessary to achieve the true promise of the public media platform and make measurable strides in journalism, education, and community engagement. The challenge is great—the media industry has laid off 30,000 employees in the past year, and 30 million American adults have below-basic literacy skills—and levels of funding needed are more significant than the Commission likely has heretofore considered. CPB strongly urges that the Commission begin to examine potential mechanisms, including regulatory flexibility, that could provide significantly increased long-term funding to

supplement annual appropriations at sufficient levels for public media content to be delivered on a diverse range of platforms to all Americans.

C. Implement and Maintain Policies that Facilitate Development of Mobile Digital Television.

The mobile digital television revolution is underway, and public media entities are actively involved in realizing the potential of this technology. CPB is supporting a PBS project to develop a children's mobile digital television service, and public television stations are considering a variety of ways to enhance service to their local communities through mobile DTV. The Commission's rules permitting ancillary and supplementary non-broadcast service enable stations to think broadly about these possibilities. CPB encourages the Commission to continue to implement policies that provide public television stations with the necessary bandwidth and regulatory flexibility to engage fully in the growth of mobile DTV.

D. Preserve Public Media's Universal Service Mission.

Public media is mandated by statute to serve all Americans. Now, and for the foreseeable future, that mission is best served by delivery mechanisms that recognize the many and varied ways that Americans consume media, including over-the-air broadcasting and on mobile devices. Likewise, given the broad diversity of population in many parts of our nation, true universal service in many communities cannot be achieved with one or two or even four streams of public media content over the air. Universal broadband is a worthy goal, one that we fully support, and one without which we cannot achieve our full promise. But with 45 million Americans relying on over-the-air reception of public television, universal service through broadcast remains essential.

E. Recommend Beneficial Updates to Copyright Laws.

Public media currently benefits from provisions of the copyright laws that permit it to create new educational programming without paying exorbitant royalty fees. However, the existing copyright laws do not reasonably accommodate the many and varied methods of content delivery we employ today, or contemplate efforts such as the American Archive. CPB requests that the Commission recommend that the benefits enjoyed by public media under the copyright laws are revised to reflect the realities of the digital age.

CONCLUSION

CPB, on behalf of the nation's public media organizations, appreciates the opportunity to offer our perspective. Public media is already realizing the benefits of broadband in helping to meet the journalism, education, and civic engagement needs of communities, and we look forward to partnering with the Commission to ensure that the promise of broadband—and with it, robust public media resources—reach all Americans.

/s/ _____
J. Westwood Smithers, Jr.
Senior Vice President and General Counsel
Robert M. Winteringham
Deputy General Counsel
Corporation for Public Broadcasting
401 Ninth Street N.W.
Washington, D.C. 20004
Phone: 202-879-9600
Fax: 202-879-9693

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