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Via Electronic Mail

December 4, 2025

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: MB Docket Nos. 20-401, 17-105, RM-11854

Dear Ms. Dortch:

One year ago, the Commission adopted new rules allowing FM radio broadcasters to target programming by geographies for the first time – thus bringing the radio industry into the modern era as able to use technology to tailor their content to the audience for at least a portion of a broadcast hour. GeoBroadcast, LLC (“GBS”) appreciates the Commission’s hard work to remove regulatory barriers and unlock this new technology. GBS is using this one-year anniversary to update the Commission on the progress that has been made to deploying its geo-targeting technology over the past year.

The Commission adopted the new rules in November 2024, and they became final in January. Since then, GeoBroadcast has worked with several broadcasters to roll out its ZoneCasting technology, which allows radio broadcasters to originate programming from boosters in line with the Commission’s rules. Additionally, during this time the company also has designed and built its longstanding MaxxCasting systems for many broadcasters, by which broadcasters use boosters to fill in existing holes from their main signals. This represents an important development since these systems can be readily upgraded to ZoneCasting capabilities. Deployment of these systems, along with the ZoneCasting applications approved by the Commission, shows how the radio industry is innovating to stay relevant and to better serve its audience and advertisers. These technologies, ZoneCasting and MaxxCasting, are currently available or being deployed in several of the largest markets including 6 of the top 10 Nielsen radio markets. Specifically, GBS-constructed systems are operating in San Francisco, Los Angeles, Chicago, San Diego, Miami, Baltimore, Boston, Cleveland, Las Vegas, San Jose, St. George (Utah), and Cumberland (Maryland), and MaxxCasting systems are being designed and constructed for New York City, Atlanta, and other markets. These systems are ready for upgrading to ZoneCasting as broadcasters continue to recognize the benefits of booster-based program origination.

By approving MaxxCasting and ZoneCasting systems, the Commission enabled new services to *reach an audience of 20 million people without requiring any new spectrum*. This remarkably spectrum-efficient innovation grants previously hard-to-reach populations access to

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the benefits of radio broadcast, including the Emergency Alert System. The Commission rightly recognized that this technology increases utilization of – without increasing the burden on – vital spectrum resources. In this time of spectrum scarcity, the Commission should celebrate how technology is being used to provide more service to more people with the same amount of spectrum.

Since the Commission adopted the rule change allowing program origination on FM boosters, GeoBroadcast has worked with broadcasters both small and large to enable geotargeted programming in eleven markets and the expansion is ongoing. Additionally, some of the largest group owners are actively exploring ZoneCasting to complement their existing MaxxCasting systems. The company looks forward to working with a range of broadcasters to unlock the benefits of geotargeted programming for listeners and advertisers alike.

The new opportunity opened up by the FCC's rule change also has attracted attention from key industry players. As Cumulus Media's Chief Insights Officer Pierre Bouvard noted, 39% of advertisers say that ZoneCasting will cause them to spend more on – or altogether begin – AM/FM radio advertising.¹ Additionally, 44% of advertisers and agencies say that they are “very interested” in the ability of radio to geotarget advertisements through technology like ZoneCasting. This technology could be particularly beneficial to a range of local advertisers, such as car dealerships and small businesses, who could benefit from hyper-local connections with audiences in their neighborhoods.

Looking ahead, GBS is eager to continue helping broadcasters geotarget programming to improve listeners' experiences. GBS sees many potential use cases beyond advertising and local news. The long-run potential is great to offer a range of content, such as longer-form local sports and candidate debates when permitted by the Commission. GBS commends the Commission for updating its rules to enable radio broadcasters to match other media in the 21st Century in delivering targeted content to its audience. We appreciate the dedication of the staff to process these changes and look forward to working with broadcasters and the Commission to make innovative radio technology available across the radio industry and around the country.

¹ Pierre Bouvard, *As More Advertisers Geotarget, New Technology Allows AM/FM Radio to Run Different Over-the-Air Ads in Different Geographies and Map the Location of In-Car Listeners*, WestWood One (July 21, 2025) <https://www.westwoodone.com/blog/2025/07/21/as-more-advertisers-geotarget-new-technology-allows-am-fm-radio-to-run-different-over-the-air-ads-in-different-geographies-and-map-the-location-of-in-car-listeners/>.

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Please direct any questions to the undersigned.

Sincerely,

_____/s/____

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Solutions*