

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

In the Matter of:)
)
Sports Broadcasting Practices) MB Docket No. 26-45
and Marketplace Developments)

**REPLY COMMENTS OF THE
ABC TELEVISION AFFILIATES ASSOCIATION,
CBS TELEVISION NETWORK AFFILIATES ASSOCIATION,
FBC TELEVISION AFFILIATES ASSOCIATION, AND
NBC TELEVISION AFFILIATES**

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The ABC Television Affiliates Association, CBS Television Network Affiliates Association, FBC Television Affiliates Association, and NBC Television Affiliates (collectively, the “**Affiliates Associations**”),¹ on behalf of more than 700 Big 4 Network-affiliated local television stations serving viewers in all 210 Designated Market Areas and every local community across the country, respectfully submit these reply comments in response to the public notice in the above-captioned proceeding.²

I. INTRODUCTION AND SUMMARY

The Affiliates Associations welcome the Commission’s attention to the important issue of the migration of televised sports behind paywalls. As many of the commenters in this

¹ Each of the ABC Television Affiliates Association, CBS Television Network Affiliates Association, FBC Television Affiliates Association, and NBC Television Affiliates is a non-profit trade association whose members consist of local television broadcast stations throughout the country, each of which is affiliated with its respective broadcast television Network. Collectively, the Affiliates Associations represent more than 700 local television stations affiliated with the four major broadcast Networks. The Affiliates Associations’ member stations provide local news, life-saving weather and emergency information, sports, entertainment, and other valuable, highly desired video content to virtually every community in the country, whether large or small, urban or rural.

² *FCC’s Media Bureau Seeks Comment on Sports Broadcasting Practices and Marketplace Developments*, Public Notice, MB Docket No. 26-45 (Feb. 25, 2026) (the “**Public Notice**”).

proceeding have noted, major sporting contests have long been and continue to be America's great unifying events.³ For decades, members of the Affiliates Associations have been the proud providers of these cherished national moments, offered for free over-the-air to Americans in every local community across the country. This was by design. Through the Sports Broadcasting Act of 1961, Congress relaxed the antitrust laws to allow major sports leagues to enter into league-wide agreements with the major broadcast Networks, and the games subject to those deals were televised by Network-affiliated television stations nationwide.⁴ In one of the greatest win-win-wins of all time, sports leagues, local broadcasters, and American consumers thrived under this framework. And the winning didn't stop with sports, because the members of the Affiliates Associations poured revenues from the advertising sold through marquee national sports broadcasting into improved local news, weather, sports, information and public affairs programming for communities across the country.

Indeed, it is no exaggeration to say that the success of America's major professional and collegiate sports leagues has been built on the broadcast platform provided by local television stations. For most of their history, stations affiliated with the major Networks have been the exclusive local showcase for marquee national professional and collegiate sporting events because (1) the Big 4 Networks traditionally were the only programmers with the financial capacity to afford national programming contracts with the major sports leagues; and (2) those leagues treasured the unmatched reach of local broadcast distribution through their local

³ See, e.g., Comments of the National Association of Broadcasters, MB Docket No. 26-45, filed Mar. 27, 2026, at 2 (“**NAB Comments**”); Comments of FOX Corporation, MB Docket No. 26-45, filed Mar. 27, 2026 (“**FOX Comments**”); Comments of Sinclair, Inc. MB Docket No. 26-45, filed Mar. 27, 2026 (“**Sinclair Comments**”).

⁴ See Sports Broadcasting Act of 1961, Pub. L. 87-331, 75 Stat. 732, codified at 15 U.S.C. §§ 1291-1295 (the “**SBA**”).

Network Affiliates. Local Affiliates also traditionally took the lead on securing local broadcast sports rights, in most cases obtaining those rights directly from popular local teams. While local television stations' transmission of local and regional sporting events declined during the era of MVPD-only regional sports networks ("RSNs"), the recent decline of those RSNs has seen local broadcast stations again taking the lead, to the best of their ability in light of their contractual restrictions with the big 4 Networks, on local and regional sports television distribution.

Today, live sports have never been more important to local television stations' well-being. As the popularity of network and syndicated entertainment programming has waned, local news programming and live sports programming form the content tentpoles that keep local stations financially afloat. As some commenters rightly point out, live sports programming is paramount to the economic health of local television stations;⁵ it is the engine of the great machine that allows local stations to produce essential local news and information programming that is vitally important to every local community.

But while live sports have never been so critical to local broadcasting, the Public Notice comes at a time when the continued availability of marquee national live professional and collegiate sporting events on local broadcast television faces unprecedented uncertainty. The Affiliates Associations echo NAB's observation that Internet streaming of sports content threatens to completely upend the system of local sports distribution that has served America so well.⁶ The increasing placement of major sports programming behind paywalls on multiple different streaming platforms, including those owned by the Big 4 Networks themselves, threatens to further fragment audiences while forcing consumers to spend more and more just to

⁵ See Sinclair Comments at 3-6; FOX Comments at 7-8.

⁶ See NAB Comments at 11-17.

watch what used to be and should remain free. Sporting events can't unify Americans if the cost of watching them turns us into a nation of haves and have-nots. And those sporting events locked up behind paywalls won't help fund local television service because, quite simply, none of the streaming platforms is required to operate in the public interest and none provide any local service to any local communities.

The Public Notice is timely because the Commission still has it within its power to try to check the trend of increased migration of local sports behind streaming paywalls. As discussed herein, the Affiliates Associations strongly urge the Commission to examine and employ its existing authority under Section 303(i) of the Act and other provisions of law to keep marquee sports programming available on free over-the-air broadcast television for American viewers and, if necessary, to work with Congress to ensure that outcome.

II. MOVING NATIONAL SPORTS PROGRAMMING BEHIND STREAMING PAYWALLS BADLY DAMAGES THE PUBLIC INTEREST.

A. The Current Market for National Sports Programming Rights Leads to Higher Costs and Inferior Service for Consumers and Local Broadcasters.

The comments in this proceeding provide a substantial record that the state of the marketplace for national sports programming is already damaging local television stations and the viewers they serve. A marketplace once characterized by a “mutually beneficial and mutually reinforcing”⁷ relationship between major sports leagues, national Networks, and local broadcast stations that gave consumers free access to the games they wanted on channels they knew has begun to splinter into an unstable mix of multiple competing Internet platforms, none of which has any ties to local American communities.⁸ As NAB points out, in 2025, NFL games

⁷ Sinclair Comments at 2, 3.

⁸ *See id.* at 10-11; NAB Comments at 18-19.

appeared on 10 different paywalled platforms, and the cost of the subscriptions necessary to watch every NFL game approached \$1,500.⁹ These developments threaten to get worse because streaming platforms owned by Google/Alphabet, Amazon, Netflix, Apple, and the like have nearly limitless budgets and face no regulations that would check their growth. Indeed, they are already increasingly outbidding Big 4 Networks for major sports rights and cutting local broadcasting out of the picture entirely.¹⁰

The pressure that streaming platforms place on the local broadcast ecosystem goes beyond confusing customers, fracturing audiences, and raising consumer prices. The willingness and virtually unlimited financial capacity of non-local streaming platforms to bid up the price of sports rights has the perverse effect of forcing local television stations to curtail local news and information services. Historically, the Big 4 broadcast Networks have retained a firm grip on broadcast rights for most major national sporting events, and those efforts have helped keep most marquee sports on local broadcast television. But even these reasonably positive recent past developments come at a cost to local communities. When the Big 4 Networks are forced to outbid streaming platforms for sports rights, those Networks inevitably pass those costs on to their Affiliates in the form of spiraling and unsustainable affiliation fees.¹¹ Since these affiliation fees grow more quickly than local station revenue, local Affiliates have no choice but to cut costs and reduce local service. Marquee sporting events must remain on local broadcast television to sustain important, but costly, local news operations, but the more sports rights cost and the higher affiliation fees rise, the less local news and fewer jobs will remain.

⁹ See NAB Comments at 14 (citing Jacob Feldman, *It Will Cost \$935 To Stream Every NFL Game This Season*, sportico.com (Sept. 5, 2025); Public Notice at 4.

¹⁰ See FOX Comments at 8-9.

¹¹ See *id.* at 10.

Moreover, competitive pressure from streaming services has led each of the Big 4 Networks to develop their own direct-to-consumer streaming services.¹² These services erode local Affiliates' traditional role as the exclusive distributors of Network programming – particularly marquee sporting events – in local markets. Some of the Big 4 Network-owned direct-to-consumer streaming platforms offer subscription packages that include local Network-affiliated stations, but the Networks willingly make marquee sports available on packages that do not include local stations, too. Indeed, in some cases, the Networks have begun offering certain games exclusively on their streaming platforms, cutting local Affiliates out of the mix entirely.¹³ It is one thing for local stations to help finance the Networks' acquisition of valuable sports programming when the Affiliates get the benefit of exclusively distributing that programming. It's quite another when the "benefit" of financing the Networks' acquisition of that sports content nets Affiliates non-exclusive distribution or no distribution at all for that same sports content. Affiliates simply can no longer absorb both the costs of Network sports rights and this erosion of exclusivity indefinitely without seriously compromising local news, information services, and jobs. And the pricing pressure from streaming giants like Google, Amazon, and Netflix that have essentially unlimited budgets and no commitment to local communities is making this situation untenable for local Affiliates, consumers, and the public interest.

¹² See Public Notice at 3; *See, e.g.*, Joint Comments of the Four Affiliates Associations, MB Docket No. 25-322, filed Dec. 10, 2025, at 4-5, 13 ("**Network/Affiliate Comments**"); Reply Comments of the Four Affiliates Associations, MB Docket No. 25-322, filed Dec. 24, 2025, at 5, 8-9 ("**Network/Affiliate Reply Comments**").

¹³ *See, e.g.*, "Peacock Holiday Exclusive" Week 17 NFL game to stream live in prime time on Saturday, Dec. 27, NFL.com, May 12, 2025, <https://www.nfl.com/news/peacock-holiday-exclusive-week-17-nfl-game-to-stream-live-in-primetime-on-saturday-dec-27>.

The Computer & Communications Industry Association (CCIA) and the Consumer Technology Association (CTA) argue that this is nothing more than the marketplace providing more and better choices to consumers and that the Commission is powerless to step in.¹⁴ Consumers know better, which is why thousands of individuals have filed comments in this proceeding urging the Commission to take action to help keep national sports programming on local broadcast television.¹⁵ The Commission should reject the arrogant and simplistic “free market” rhetoric of CCIA and CTA. Despite the claims of CCIA and CTA that all of this “competition” among streaming platforms will increase choice and lower prices, the reality is that consumers always end up paying more for less, and they’re sick of this same old song and dance.¹⁶ The Commission shouldn’t fall for it. The best way to further the President’s Affordability Agenda is to keep marquee national sports programming on free over-the-air broadcast channels, not to further the speedy slide toward a status quo where all of that programming retreats behind consumer-crushing paywalls.¹⁷

B. While the Local Market for Sports Broadcasting Rights Shows Promise, Network Preemption Rules Hinder Full Affiliate Participation in that Market.

While the availability of marquee national sports programming on local television faces significant challenges from streaming services, the Affiliates Associations can highlight for the

¹⁴ See Comments of the Computer & Communications Industry Association, MB Docket No. 26-45, filed Mar. 27, 2026; Comments of the Consumer Technology Association, MB Docket No. 26-45, filed Mar. 27, 2026.

¹⁵ Indeed, there are nearly 9,000 comments from American citizens in this docket, with almost all of them making the same arguments. See, e.g., Comment of Mr. James McNiff, MB Docket No. 26-45, filed Apr. 7, 2026.

¹⁶ See text at n.9, *supra* (noting that the Public Notice cites sources saying that consumers are now paying upwards of \$1,500 for what once was free).

¹⁷ See, e.g., Nicole Huyer, *How Trump is Making Life Affordable Again*, THE HERITAGE FOUNDATION, Jan. 8, 2026, <https://www.heritage.org/markets-and-finance/commentary/how-trump-making-life-affordable-again>.

Commission a modest bright spot in the sports rights ecosystem: the market for local and regional professional and collegiate sports rights has become more accessible to local television stations – and the Commission can help further than positive trend. In recent years, the rise of streaming services and the accompanying decline in traditional MVPD subscribers has led to an implosion of the regional sports network ecosystem.¹⁸ The decline of cable-only regional sports networks has created opportunities for local stations to again compete for the local distribution rights for major sports teams and events. While these rights are expensive, profitable local television station groups can acquire them under the right circumstances. Several station groups have successfully acquired such rights in recent years.¹⁹

Even here, however, there are hurdles to local stations acquiring local sports rights. In particular, Big 4 Network preemption policies can make it impossible for stations to air more than a handful of games of local sports programming on their main channels, forcing them to instead broadcast that programming on multicast channels or commonly owned independent channels.²⁰ These alternate channels are carried less frequently by traditional MVPDs and even less frequently by virtual MVPDs (“vMVPDs”). The combination of Network preemption policies and vMVPDs’ refusal to negotiate directly with local television stations significantly complicates local stations’ efforts to acquire sports programming on local broadcast stations. While some local broadcasters have managed to fight through these hurdles, the Commission

¹⁸ See, e.g., Alex Weprin, *Behind the Slow-Motion Implosion of Regional Sports Networks*, THE HOLLYWOOD REPORTER, July 17, 2023, <https://www.hollywoodreporter.com/business/business-news/mlb-nba-rsn-sports-networks-1235538067/>.

¹⁹ See e.g., Scripps Sports, <https://scripps.com/our-brands/scripps-sports/>; Gray Broadcast Sports Networks, <https://graymedia.com/brands/gray-sports-networks/>.

²⁰ The application of Network preemption policies against Affiliates is particularly suspect in view of the fact that for some local sports content, the Networks have indicated a desire to acquire it themselves.

should consider in this proceeding the ways it can modify its rules to remove barriers to local stations obtaining sports broadcasting rights and to have the legitimate rights to negotiate for carriage of all of their stations (big 4 affiliated and independents) directly with the vMVPDs.

III. THE FCC HAS AN IMPORTANT ROLE TO PLAY IN ENSURING MARQUEE SPORTS PROGRAMMING REMAINS AVAILABLE FREE OVER-THE-AIR.

Maintaining American television viewers' access to free over-the-air sports programming is unquestionably in the public interest. Local television stations have been delivering marquee sporting events to their viewers for as long as that content has been televised, and Americans expect and deserve to have marquee sports programs available at a familiar, free destination. Sports teams, leagues, and public universities receive massive public subsidies and public policy advantages.²¹ If they are to continue to receive such preferential treatment and benefits, there ought to be reciprocity for taxpayers in the form of free, over-the-air marquee sports programming in front of paywalls.

A. The Commission Should Repeal Its Station Ownership Rules and Expedite the ATSC 3.0 Transition.

The Commission should take all steps available to encourage both the sports leagues and the Networks to keep marquee national sports on local broadcast television and to foster local stations' capacity to acquire local and regional sports rights. For example, the Affiliates Associations agree with NAB and Sinclair that the Commission can help this effort by reforming its ownership rules to allow local broadcasters to achieve the scale necessary to more effectively attempt to compete for local and national sports rights.²² Under today's regulatory regime, local

²¹ Sinclair Comments at 8-11.

²² See NAB Comments at 23-26; Sinclair Comments at 14; see also Comment of the Center for American Rights, MB Docket No. 26-45, filed Mar. 27, 2026, at 8 ("**CAR Comments**").

broadcasters have no hope of gaining any semblance of negotiating balance with any sports league or team. That should change, and reform of the ownership rules is the only way to achieve that change.

Likewise, expediting the ATSC 3.0 transition and providing broadcasters and consumers with an end date for the transition will strengthen local sports broadcasting. ATSC 3.0 will provide a peerless viewing experience for sports programming, but Commission leadership is necessary to get the ATSC 3.0 transition to the finish line. The Commission should move promptly to establish a deadline for full transition to the ATSC 3.0 broadcast standard.²³

B. The Commission Should Confirm That Local Affiliates Have the Freedom to Negotiate for Local Sports Rights and vMVPD Signal Carriage.

In addition, the Commission must recognize that additional steps must be taken in order to preserve – and grow – sports on local television stations while at the same time helping ensure stations are financially healthy enough to afford that programming and are positioned to acquire that programming when certain rights become available. That requires the Commission to address two pressing issues that the Affiliates Associations’ members face every day.

First, the Commission should ensure that local television stations, including Network Affiliates, have the right to negotiate for local sports programming without third-party interference. In support of this right, the Commission should make clear that local stations’ preemption rights under the Commission’s rules extend to preempting Network programming for local and regional sports content.²⁴ Existing rules require that broadcasters must have the right to preempt Network programming in favor of programming that a licensee deems, in its mandate to

²³ See NAB Comments at 26-29; Sinclair Comments at 14-15.

²⁴ See CAR Comments at 7-8.

serve the local community, of greater importance to its local community than Network programming.²⁵ The Commission should clarify unequivocally that this right applies when a local station rejects Network programming in favor of airing local and regional sports programming. This step will allow local broadcasters to compete for local sports rights without the fear that doing so could negatively impact their relationship with their affiliated Networks.

Second, the Commission should reaffirm that local stations – not national Networks – have the legitimate right to negotiate retransmission of their signals on vMVPD platforms. As the Affiliates Associations have explained in previous filings, the current Network-negotiated opt-in paradigm precludes vMVPD retransmission of multicast channels and independent stations.²⁶ The Networks won't negotiate for those signals, and the vMVPDs won't negotiate with local Affiliates. That means the multicasts and independent stations that are frequently the home of local sports programming aren't carried by vMVPDs. The inability to offer vMVPD distribution of their signals impedes local stations' acquisition of local sports rights.

Accordingly, the Commission should clarify that its rules require vMVPDs to negotiate retransmission directly with local television stations rather than those stations' affiliated Networks.

C. The Commission Should Take All Necessary Steps To Ensure Sports Rights Negotiations and Outcomes Are Consistent with the Sports Broadcasting Act.

Marquee national sports programming won't stay on local broadcast channels unless the sports leagues and the Networks keep it there. While the FCC may not have the authority to

²⁵ See 47 C.F.R. §73.658(e).

²⁶ See, e.g., Network/Affiliate Comments at 16-22; Network/Affiliate Reply Comments at 9-12. Undoubtedly, the Commission has the authority to address this issue though its authority under Section 303(i) of the Act.

order sports leagues to license their programming to particular distributors, it does have authority to regulate the relationship between Networks and their Affiliates and to work with Congress to ensure the intents and purposes of the Sports Broadcasting Act are upheld.

The purpose of the SBA was quite simply to ensure that sports leagues and broadcast Networks could negotiate contracts that would ensure the availability of major sports television programming for all Americans. Congress gave the sports leagues a very valuable antitrust exemption to allow each league's teams to pool their distribution rights on broadcast television in exchange for the certainty that these games would be broadcast free over-the-air across the country. A lot has changed since the SBA was enacted over 60 years ago. The sports leagues have tested the limits of the statute by applying it to negotiations with non-broadcast distributors that put the programming behind paywalls. And even the Big 4 broadcast Networks increasingly air more and more marquee sporting events behind paywalls on their own streaming platforms.

The Affiliates Associations agree with FOX and Sinclair that putting marquee sports programming behind paywalls seriously undermines the basis for the SBA's antitrust exemption.²⁷ Indeed, the Affiliates Associations would go a step further and join the Center for American Rights in urging the Commission to clearly state its legal conclusion that the SBA covers only agreements that ensure local over-the-air broadcast distribution of all league games.²⁸ This conclusion is plain from the face of the SBA, which covers only agreements for the "sponsored telecasting" of major league games by broadcast stations, cable systems, or

²⁷ See FOX Comments at 13; *see also* Sinclair Comments at 9-10; NAB Comments at 21-23.

²⁸ See CAR Comments at 8-9.

satellite providers.²⁹ There is no provision permitting the exemption for streaming deals, and the Commission should say as much. Making such a declaration would be consistent with past policy pronouncements of the Commission designed to carry out the purposes of the SBA.³⁰

The Commission may lack direct authority to apply or enforce the SBA, but as the expert agency regulating American media and ensuring it operates in the public interest for the benefit of all Americans, the Commission has a responsibility to inform Congress when federal policies are being abused or distorted. Accordingly, the Affiliates Associations echo Sinclair's call for the Commission to develop a robust record and transmit it to Congress with the recommendation for further action to keep marquee national sports on free local broadcast airwaves.³¹ Members of Congress are already moving in this direction,³² but a strong recommendation from the Commission would give these efforts increased urgency and impetus. The Commission should recommend to lawmakers that Congress ensures the SBA antitrust exemption enjoyed by the sports leagues applies only to distribution deals that result in free over-the-air distribution of league games.

Finally, the Commission should exercise its authority under Section 303(i) of the Act to ensure that when Networks obtain the rights to retransmit sporting events pursuant to agreements that utilize the antitrust exemption in the SBA, the Networks must distribute all of those games, exclusively, via their local affiliated stations. Local exclusivity for distribution of Network

²⁹ See 15 USC Section 1291, *et seq.*; 47 USC § 303c(b)(3).

³⁰ See Amendment of Part 76 of the Commission's Rules and Regulations Relative to Cable Television Systems and the Carriage of Sports Programs on Cable Television Systems, *Report and Order*, 54 F.C.C. 2d 265, 280 (1975).

³¹ See Sinclair Comments at 13-14.

³² See Letter from Senator Mike Lee to The Honorable Omeed A. Assefi, Acting Assistant Attorney General, *et al.*, dated Mar. 2, 2026, <https://www.lee.senate.gov/services/files/A820C118-2F19-4243-BC9E-C51A085C2D13>.

content is essential to the health of local broadcast stations and is clearly in the best interests of the local community. When Networks place the same games on their streaming platforms in direct competition with their local Affiliates that must pay them for the right to broadcast those same games, the Networks undermine the entire broadcast distribution model – to the detriment of all of us as Americans, both as sports fans and also as consumers of local news. Threats like that were exactly what Section 303(i) was adopted to counteract, and the Commission should use it to require the Networks to provide their Affiliates with local exclusivity. Networks should not be permitted to compete with their affiliates for distribution of marquee sporting events that Affiliates help pay for.

IV. CONCLUSION

For the foregoing reasons, the Affiliates Associations urge the Commission to take the steps described herein to keep sports programming on free over-the-air broadcast television.

Respectfully Submitted,

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