



1919 S. Eads St.  
Arlington, VA 22202  
703-907-7600  
CTA.tech

*Via electronic filing*

September 10, 2025

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

Re: *Authorizing Permissive Use of the “Next Generation” Broadcast Television Standard (GN Docket No. 16-142); Modernization of the Nation’s Alerting Systems (PS Docket No. 25-224); Protecting Against National Security Threats to the Communications Supply Chain Through the Equipment Authorization Program (ET Docket No. 21-232); Promoting the Integrity and Security of Telecommunications Certification Bodies, Measurement Facilities, and the Equipment Authorization Program (ET Docket No. 24-136)*

Dear Ms. Dortch:

On Monday, September 8, representatives of the Consumer Technology Association (CTA®) met with Commissioner Olivia Trusty. A full list of meeting participants is attached along with a copy of slides shown during the meeting.

As North America’s largest technology trade association, CTA is the tech sector. Our members are the world’s leading innovators – from startups to global brands helping support more than 18 million American jobs. CTA owns and produces CES® – the most powerful tech event in the world. CTA is the trade association representing more than 1200 companies in the U.S. technology industry. Eighty percent of CTA companies are small businesses and startups; others are among the world’s best-known brands. We provide members with policy advocacy, market research, technical education and standards development. As illustrated by [CTA’s 2025 Innovation Agenda](#), CTA supports policy that encourages innovation, empowers consumers and encourages a competitive marketplace. We appreciate the opportunity to share our perspective on critical regulatory issues currently before the FCC.

#### NEXTGEN TV

CTA firmly opposes the National Association of Broadcasters’ (NAB) petition<sup>1</sup> requesting the FCC mandate that all televisions must add a ATSC 3.0 tuner. As CTA consistently argues in the record, mandating specific technologies imposes real costs on consumers, stifles

---

<sup>1</sup> Petition for Rulemaking of the National Association of Broadcasters, GN Docket No. 16-142 (Feb. 26, 2025).

innovation and creates unnecessary regulations.<sup>2</sup> More, CTA Market Research also shows that nearly all U.S. adults have access to multiple devices in the home that provide video content. Consumers report the greatest ownership of smartphones and TVs.<sup>3</sup> NAB's demand for a technology mandate to support their own video is not a surprise. As illustrated by the attached exhibits, NAB has repeatedly requested government intervention in favor of their technology for well over a decade.<sup>4</sup> Historically NAB turns to this tactic when consumer demand for the technology is not proven. Here, market trends demonstrate that streaming viewership has consistently surpassed traditional broadcast, with recent Nielsen data indicating streaming accounted for 21.4% of all TV viewing in July, versus 18.4% for broadcast – a trend persistent since May.<sup>5</sup>

### Emergency Alerts

Public safety is an important factor in how consumers use their devices. To understand which devices consumers rely on the most to receive emergency alert information, CTA conducted a [survey](#) to determine how U.S. adults received/heard the nationwide emergency alert on October 4, 2023. Nineteen in twenty (95%) or 245 million U.S. adults received/heard the October 4 emergency alert via their phone. Specifically, 92% of U.S. Adults (237 million) indicated they received the alert through their smartphone, which typically include multiple accessibility and other customization features.<sup>6</sup>

### Equipment Authorization and National Security

Recognizing the vital importance of national security, CTA supports efforts to protect critical infrastructure and consumers from cyber threats.<sup>7</sup> CTA also supports the FCC's commitment to maintaining the integrity of the Equipment Authorization Program. However, we urge caution regarding proposals that could increase consumer costs, impede innovation and disrupt supply chains throughout the technology industry.<sup>8</sup> CTA also recently joined the Alliance for Automotive Innovation, Information Technology Industry Council and others to express significant concerns regarding the proposal to update the Covered List based on the Bureau of Industry and Security's final rule on connected vehicles.<sup>9</sup>

---

<sup>2</sup> See *generally* Comments of Consumer Technology Association, GN Docket No. 16-42 (filed May 7, 2025) and Reply Comments of Consumer Technology Association, GN Docket No. 16-142 (filed June 6, 2025).

<sup>3</sup> *The Video Ecosystem: The Future of TV*, CTA (Feb. 2025) <https://www.cta.tech/research/the-video-ecosystem-the-future-of-tv/>.

<sup>4</sup> Consumer Tech Association (@CTATech), X (July 29, 2025, 2:22 PM), <https://x.com/CTATech/status/1950260560626368831>.

<sup>5</sup> Tom Butts, *Streaming on Roku Surpasses Broadcast Viewership in the U.S. for Third Consecutive Month*, TV Tech (Sept. 3, 2025), <https://www.tvtechnology.com/news/streaming-on-roku-surpasses-broadcast-viewership-in-the-u-s-for-third-consecutive-month>.

<sup>6</sup> CTA U.S. Adult Emergency Alert Survey 2023 (Oct. 2023), <https://cdn.cta.tech/cta/media/media/pdfs/cta-u-s-adult-emergency-alert-survey-2023.pdf>.

<sup>7</sup> See, e.g., J. David Grossman, *The U.S. Cyber Trust Mark: Empowering Consumers & Manufacturers for a More Secure America*, LinkedIn (Apr. 17, 2025), <https://www.linkedin.com/pulse/us-cyber-trust-markempowering-consumers-more-secure-america-zbo4e/>.

<sup>8</sup> See *generally* Comments of Consumer Technology Association, ET Docket No. 24-136 (filed Aug. 15, 2025).

<sup>9</sup> See *generally* Letter from Alliance for Automotive Innovation et. al., to Brendan Carr, Chairman, FCC, and Jeffrey Kessler, Under Secretary, Commerce for Industry and Security, ET Docket No. 21-232 (filed Sept. 4, 2025).

### Accessibility

CTA is deeply committed to advancing technologies that improve lives and broaden opportunities, including for seniors and people with disabilities. The [CTA Foundation](#) furthers this mission by connecting these communities to life-enhancing technologies. We look forward to contributing to the Consumer Protection and Accessibility Advisory Committee (CPAAC) and continued engagement with the FCC on these important issues.

### Connectivity and Spectrum

CTA encourages continued investment in 5G and 6G infrastructure, broadband expansion and efficient use of licensed and unlicensed spectrum. To that end we are pleased with the reinstatement of the FCC's spectrum auction authority.

CTA thanks the FCC and Commissioner Trusty for their continued focus on policies that drive innovation, support competition and meet the needs of all Americans. CTA also looks forward to supporting Commissioner Trusty's goal of promoting universal connectivity, national security and American leadership in next generation communications technology.

Pursuant to Section 1.1206 of the FCC's rules, this letter is being electronically filed with your office.<sup>10</sup> Please contact the undersigned if you have any questions regarding this filing.

Respectfully submitted,

/s/ Rachel Nemeth

Rachel Nemeth  
Senior Director, Regulatory Affairs

cc: FCC Meeting Attendees (via email)

Enclosure

---

<sup>10</sup> 47 C.F.R. § 1.1206.

## Exhibit

### Consumers Have Plenty of Options for Information and Entertainment



**Satellite  
Radio**



**FM Radio**



**Streaming**

#NABMandateMadness

**CTA**  
Consumer Technology Association, producer of CES®

### NAB Has a History of Requesting Government Mandates for Broadcast Technologies



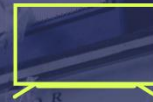
**2012**

FM radio chips  
in cell phones



**2023**

AM radio  
in cars



**2025**

ATSC 3.0 tuners  
in TVs

#NABMandateMadness

**CTA**  
Consumer Technology Association, producer of CES®

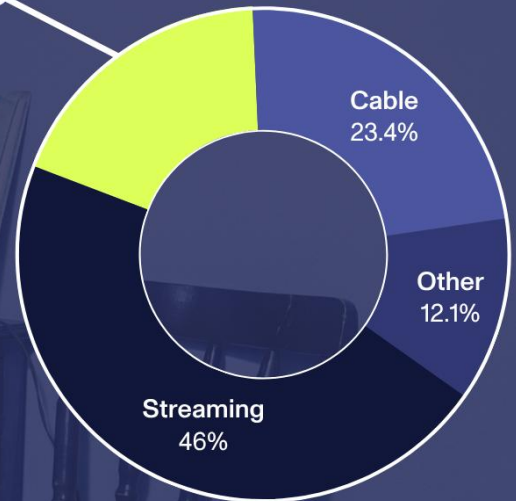


Broadcast TV viewership is **at an all time low.**

**Broadcast 18.5%**

of total TV viewership, the first time the category has fallen below 20%

So why does the NAB insist on requesting mandates for it?



Source: Nielsen, July 2025

#NABMandateMadness

**CTA**  
Consumer Technology Association, producer of CES®

Consumers Have Plenty of Options for Information and Entertainment



**Broadcast Television**



**Cable Television**



**Streaming Services**

#NABMandateMadness

**CTA**  
Consumer Technology Association, producer of CES®

## **Attendees**

### **CTA**

Gary Shapiro, CEO and Vice Chair

Kinsey Fabrizio, President

Tiffany Moore, Senior Vice President, Political and Industry Affairs

Rachel Nemeth, Senior Director, Regulatory Affairs

### **FCC Office of Commissioner Trusty**

Commissioner Olivia Trusty

Krista Senell, Chief of Staff and Senior Counsel

Marcus Maher, Senior Legal Advisor