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Via ECFS

June 2, 2026

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

Re: Written *Ex Parte* Presentation
FCC's Media Bureau Seeks Comment on Sports Broadcasting Practices and Marketplace Developments, MB Docket No. 26-45; Authorizing Permissive Use of the "Next Generation" Broadcast Television Standard, GN Docket No. 16-142

Dear Ms. Dortch,

Consumer Technology Association (CTA)¹ submits additional data and evidence into the record that the vibrant sports media and technology ecosystem gives consumers unprecedented access to sports content on the devices consumers choose, whether at home or on the go.²

CTA recognizes that streaming services currently complement broadcast content and will continue to do so as broadcast transitions to ATSC 3.0. CTA joined broadcasters in the original ATSC 3.0 Petition, and has been clear in its support for a voluntary transition to ATSC 3.0 that lets consumers choose the devices that most meet their needs, on their preferred timeline and price point.³ Contrary to broadcaster claims, CTA's members focus on delivering the best possible user experiences based on

¹ 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 17 million American jobs. CTA owns and produces CES®—the most powerful tech event in the world.

² *FCC's Media Bureau Seeks Comment on Sports Broadcasting Practices and Marketplace Developments*, Public Notice, MB Docket No. 26-45, DA 26-188 (MB rel. Feb. 25, 2026); see *generally* Comments of CTA, MB Docket No. 26-45 (Mar. 27, 2026) (CTA Sports Comments).

³ See *generally* Joint Petition for Rulemaking of America's Public Television Stations et al., GN Docket No. 16-142 (Apr. 13, 2016), <https://www.fcc.gov/ecfs/document/60001667342/1> (ATSC 3.0 Petition); Reply Comments of Consumer Technology Association, GN Docket No. 16-142 (Feb. 18, 2026) (CTA *Fifth NPRM* Reply Comments).

consumer demand and preferences, not simply “selling more devices to consumers.”⁴ This focus on meeting user needs explains the growing popularity of CTA member products and services, compared to the steady decline in consumer reliance on over-the-air broadcasting.

One of the many ways streaming services complement traditional broadcast offerings is by empowering consumers to both “flip[] a channel” on their TV⁵ and access additional sports and other video content on the *same device*, with built-in apps or relatively inexpensive digital media players.

Consumers Want Access to Sports Across Their Devices Wherever They Are— Not Fewer Choices

CTA agrees with commenters that traditional over-the-air broadcasting remains an important option for viewing live sports.⁶ As consumers increasingly demand more flexibility and control over how they watch content, streaming and other technology-driven platforms complement broadcasting by expanding consumer choice and filling gaps. Even when broadcasters air sporting events in the broadcast market where most of a team’s fanbase is located,⁷ the technological nature of broadcasting makes it both time- and geography-limited, which can prevent certain viewers from tuning in. Streaming provides greater flexibility and convenience by allowing fans to watch games anywhere and on any device—at home out of the local market, on a smartphone during a commute, on a tablet while they travel or on a laptop in a dorm room.⁸

Broadcast and streaming services work together to help fans access their preferred sports and other valuable video content. For example, professional European football leagues often play on weekend mornings, when many American broadcasters air children’s television programming and religious services, and weekend afternoons, when broadcasters air American football, basketball, baseball, and hockey. Although broadcasters may be appropriately airing programming that is more popular or locally oriented, streaming and pay TV offer these soccer fans essential alternative platforms to view the content most important to them.

⁴ Reply Comments of the National Association of Broadcasters (NAB), MB Docket No. 26-45, at 14 (Apr. 13, 2026) (NAB Reply Comments).

⁵ *Id.* at 13.

⁶ Indeed, CTA is aware of no commenter arguing that broadcast television should cease to be a part of a dynamic sports video marketplace.

⁷ See, e.g., *NFL Media Overview*, at 8-10 (Apr. 2026) attached to letter from Brendon Plack, SVP Government Affairs and Public Policy, National Football League, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 26-45 (Apr. 21, 2026) (demonstrating that different games are aired on broadcast in different markets to “put the most compelling game into each market” and asserting that “[a]ll games [are] free OTA in local market”) (*NFL Ex Parte*).

⁸ Stephen Graveman, *Why More Viewers Are Streaming Sports, Including March Madness*, MNTN Research, <https://research.mountain.com/insights/streaming-sports> (last visited June 1, 2026) (MNTN Research).

Streaming has also dramatically expanded access to women’s sports, emerging leagues, niche sports, and out-of-market teams that historically struggled to secure meaningful broadcast coverage. Traditional broadcast schedules are constrained by geography, programming windows, and limited channel capacity. Streaming removes many of those barriers and allows leagues and rights holders to reach national and global audiences directly.⁹

For example, the Professional Women’s Hockey League (PWHL) is a relatively new and small professional league—with only four teams in the United States—that is generally available on pay television, with very select games aired on broadcast, where the league has local teams.¹⁰ At the same time, all games are available for free on the PWHL’s YouTube channel and [thepwhl.com](https://www.thepwhl.com).¹¹ A fan of the Minnesota Frost that lives in St. Paul can view the team’s games through the regional FanDuel Sports Network North and occasionally FOX 9+ Minneapolis, while hockey fans in locations without a local team can watch any of the league’s games via free streaming alternatives anywhere in the U.S. and most places worldwide.¹² A fan of the Frost can still follow the team through streaming, even though games are not available on local broadcast outlets.

Many streaming options also include features that let fans watch games on-demand, ensuring they never miss events due to work or social commitments, and allow a viewer to pause, rewind, or fast-forward to watch the game at their own pace.¹³ Streaming enables personalization, real time interactivity, multilingual broadcasts, alternative commentary feeds, customized highlights, and other features that can make fans feel more connected to their favorite teams and sports.¹⁴ To the extent that ATSC 3.0 will enable broadcasters to roll out similar features,¹⁵ CTA encourages broadcasters to

⁹ NAB asserts that CTA “perplexingly claims that streaming services are somehow special because they air niche sports, women’s leagues, and high school games” while arguing that broadcasters sometimes air this type of content, too. NAB Reply Comments at 13. CTA celebrates that broadcasters are interested in this type of content, but the reality is that broadcast airtime is a limited resource, and with respect to sports, is understandably most frequently used to air the most traditionally popular sports events. Streaming services are unbound by the airtime limitations of broadcast and therefore serve as a complement to broadcasts, irrespective of whether broadcasters also devote time towards airing such worthy sports content.

¹⁰ *Where to Watch*, The Professional Women’s Hockey League, <https://www.thepwhl.com/en/where-to-watch> (last visited June 1, 2026).

¹¹ *Id.*

¹² *Id.*; The PWHL, YouTube, <https://www.youtube.com/@thepwhlofficial/streams> (last visited June 1, 2026).

¹³ MNTN Research. On-demand options also allow viewers to tune in to competing content, including other sports games that may be occurring at the same time, thereby benefiting the entire ecosystem.

¹⁴ Mollie Cahillane, *Study: Nine in 10 sports fans are streaming sports*, Sports Business Journal (July 3, 2025), <https://www.sportsbusinessjournal.com/Articles/2025/07/03/study-nine-in-10-sports-fans-are-streaming-sports> (Sports Business Journal Article).

¹⁵ NAB Reply Comments at 14.

market these advancements so that consumers understand the benefits of NEXTGEN TV-capable devices.¹⁶

In today's competitive media landscape, sports media rights holders compete for audiences and must deliver content when and where consumers demand it.¹⁷ This marketplace is driven by consumer preferences and viewer expectations, and available data show that consumers increasingly use streaming options, whether through their home TV or another device. Nine in 10 sports viewers now use at least one streaming service to watch live games, with a sizable portion of viewers relying exclusively on streaming.¹⁸ Younger generations increasingly turn to streaming for sports. A recent poll conducted by Sportico and Harris Poll found that Millennials and Gen Z prefer streaming services over broadcast television for live sporting events.¹⁹

Claims that adding streaming options to the marketplace causes consumers to "always end up paying more for less" are not supported by evidence.²⁰ Consumers can still watch sports free over-the-air, yet many choose streaming because they value enhanced access and flexibility, proving they view streaming as offering more value, not less.²¹ Streaming packages are available at a wide range of price points, allowing

¹⁶ See Dasha Milden, *Americans Plan to Spend \$1,177 on a New TV. Here's How to Do It for Less in Time for the Big Game*, CNET (Feb. 5, 2026), <https://www.cnet.com/tech/home-entertainment/tv-survey-2026> (CNET's TechPulse reported that consumers most desire a bigger screen, high-quality picture and smart features in a TV, while consumers did not appear to even mention ATSC 3.0 in high enough numbers to indicate that consumers seek ATSC 3.0 as a key feature when purchasing a television).

¹⁷ See News Release, U.S. Department of Justice, Deputy Assistant Attorney General G. Charles Beller Delivers Remarks at NAB Show Las Vegas (Apr. 24, 2026), <https://www.justice.gov/opa/speech/deputy-assistant-attorney-general-g-charles-beller-delivers-remarks-nab-show-las-vegas> ("But the ways in which content reaches consumers have continued to evolve, often in ways that expand competition rather than limit it. The internet did not simply replace existing distribution channels; it multiplied them."); NFL *Ex Parte* at 2 ("Pay TV households Continue Decline / Digital Engagement Continues to Grow").

¹⁸ Sports Business Journal Article. According to a Parks Associates and InterDigital 2025 survey, of U.S. internet households that identify as "sports viewers," 40% said they watch sports exclusively using streaming platforms, and 30% said they watch via both streaming platforms and traditional linear TV offerings; only 19% said that they exclusively watch sports on traditional broadcast, satellite, or cable. See Travis Clark, *70% of U.S. sports viewers watch via streaming*, The Current (Aug. 6, 2025), <https://www.thecurrent.com/readout-70-us-viewers-sports-streaming>.

¹⁹ MNTN Research.

²⁰ Reply Comments of ABC Television Affiliates Association et al., MB Docket No. 26-45, at 7 (Apr. 13, 2026).

²¹ Contrary to NAB's claim that "the growing trend of streaming service cancellations after the end of the sports season" demonstrates a negative consumer sentiment about streaming, it is in fact an example of the flexibility and customization that streaming allows. Whereas a typical cable subscription ranges from one to three years, see *Find Cable TV Providers In Your Area*, InMyArea.com, <https://www.inmyarea.com/tv/cable> (last visited June 1, 2026), most streaming services allow for consumers to subscribe on a month-to-month basis, meaning they can tune in

consumers to choose products that best fit their needs and budgets.²² Free ad-supported streaming television (FAST) channels have become a popular addition to the market by combining the benefits of streaming—such as device compatibility and mobile viewing—with the same free access provided by broadcast TV. For example, Swerve TV’s Swerve Sports provides 24/7 access to women’s football, basketball, soccer, volleyball, and more,²³ and Red Bull TV offers free streams of niche sports like cliff diving, padel, and surfing.²⁴ These and other FAST outlets are expanding the availability of live sports without additional cost.²⁵

Streaming gives consumers more—not fewer—choices. This evolution creates a more competitive and innovative marketplace that benefits consumers by offering broader content options, greater device compatibility, and new ways to enjoy sports.

Maintaining the Voluntary Transition to ATSC 3.0 Avoids Burdening Consumers with Unnecessary Costs

CTA has consistently supported the transition to ATSC 3.0 to maximize consumer choice and empower viewers to shape the future of the marketplace.²⁶ *Consumers*, not

during the season and unsubscribe when they are not interested, keeping more money in their pocket as a result. See, e.g., Kate Ashford et al., *What Is the Best Streaming Service for You? How to Choose*, NerdWallet (Mar. 30, 2026), <https://www.nerdwallet.com/finance/learn/best-streaming-service> (NerdWallet Article).

²² See, e.g. MNTN Research (“Many streaming services offer sports packages at a lower cost than traditional cable or satellite providers.... Moreover, viewers can choose the specific sports or teams they want to follow.”); Camryn Smith, *Cost of cable vs. streaming: Which is cheaper?*, Allconnect (Apr. 22, 2026), <https://www.allconnect.com/blog/cable-vs-streaming-costs> (“Live TV services with streaming allow you to watch the channels you’d get with cable but at a base price with no added local broadcast fees.”); James K. Willcox, *Guide to Streaming Video Services*, Consumer Reports (Apr. 13, 2026), <https://www.consumerreports.org/electronics-computers/streaming-media/guide-to-streaming-video-services-a4517732799>; NerdWallet Article.

²³ George Winslow, *Swerve TV Launches Swerve Sports on Roku, Pluto TV*, TV Tech (July 30, 2025), <https://www.tvtechnology.com/news/swerve-tv-launches-swerve-sports-on-roku-pluto-tv/>; *Swerve Women’s Sports*, Swerve, <https://swerve.tv/swervewomenssports/> (last visited June 1, 2026).

²⁴ Red Bull.TV, https://www.redbull.tv/en_US (last visited June 1, 2026).

²⁵ See, e.g., Roku Channel, <https://therokuchannel.roku.com/browse/w.2AljKalaW8sNYmW0KYYafRQDLV6ZzgUz1Nmkv0M2UKbx6JwAa/sports> (last visited June 1, 2026); *sports*, Tubi, <https://tubitv.com/search/sports> (last visited June 1, 2026); Samsung TV Plus, <https://www.samsungtvplus.com/> (last visited June 1, 2026); Pluto TV, <https://pluto.tv/us/hub/home?lang=en> (last visited June 1, 2026).

²⁶ See Comments of America’s Public Television Stations et al., GN Docket No. 16-142, at 1 (May 9, 2017) (“The Commission has a unique opportunity in this proceeding to allow market forces to bolster innovation, enhance competition and expand service offerings available for free to consumers. By approving voluntary use of the Next Generation TV (Next Gen) transmission standard, the Commission will allow broadcasters to offer exciting and innovative services, including visually stunning pictures, more immersive audio, superior reception, enhanced public

broadcasters or government mandates, should lead the way. The availability of NEXTGEN TV-enabled products continues to grow and meet marketplace demand without a mandate.²⁷ CTA research shows that NEXTGEN TV sales from 2020, the first year these products became available, through 2025 total 18.6 million units. CTA forecasts sales of 5 million NEXTGEN TVs this year. Sales of NEXTGEN TV converter boxes or gateways total 313,000 units through 2025, and CTA expects an additional 121,000 units to sell this year.

Despite the availability of NEXTGEN TV-enabled products available for purchase in the marketplace, adoption and awareness has been slower than NAB would prefer because consumers prioritize other features.²⁸ CTA market research shows that less than 10% of consumers rely solely on an over-the-air antenna to watch content,²⁹ and Nielsen data shows that just over 18% of U.S. TV households had at least one TV set capable of receiving over-the-air broadcasts.³⁰ If ATSC 3.0 is mandated, the more than 80% of households that do not use over-the-air television will bear the added costs associated with the tuner mandate without any benefit.³¹ More, because TVs with ATSC 3.0 tuners continue to cost more than those with ATSC 1.0, a mandate would also burden consumers that *do* rely on over-the-air broadcasts with costly upgrades.

Seventy-four percent of consumers agree that “new product features included within televisions should be left to consumer demand rather than mandated by the government at the expense of the consumer.”³² An ATSC 3.0 mandate would impose across-the-board costs on all consumers, while a voluntary approach allows consumers to choose the products and services that best meet their needs. Far from “only car[ing] about

safety capabilities and other features.”); Letter from Julie M. Kearney et al., Vice President, Regulatory Affairs, CTA, to Honorable Ajit Pai et al., Chairman, FCC, GN Docket No. 16-142, at 1 (Oct. 19, 2017) (“[CTA] reiterates our support for the Commission’s efforts to accelerate the nation’s transition to Next Generation TV service (‘Next Gen TV’) by allowing broadcasters and manufacturers to implement the ATSC 3.0 television transmission standard on a voluntary, market-driven basis.”).

²⁷ See Comments of Consumer Technology Association, GN Docket No. 16-142, at 8-9 (May 7, 2025).

²⁸ CTA *Fifth NPRM* Reply Comments at 3-4.

²⁹ *2025 U.S. Consumer Technology Ownership & Market Potential Study*, CTA (May 2025), <https://www.cta.tech/research/2025-us-consumer-technology-ownership-market-potential-study/>; Letter from Brian Markwalter et al., Senior Vice President, Research & Standards, CTA, to Marlene H. Dortch, Secretary, FCC, GN Docket No. 16-142 (Mar. 20, 2026), <https://www.fcc.gov/ecfs/document/1032061553860/1>.

³⁰ *Beyond big data: The audience watching over the air*, The Nielsen Company (U.S.) (Jan. 2024), <https://www.nielsen.com/insights/2024/beyond-big-data-the-audience-watching-over-the-air>.

³¹ Comments of Consumer Technology Association, GN Docket No. 16-142, at 9 (Jan. 20, 2026).

³² *NEXTGEN TV Consumer Awareness*, CTA, at 2 (Feb. 2026), <https://www.cta.tech/research/nextgen-tv-consumer-awareness>.

selling more devices to consumers,”³³ CTA members are empowering consumers with a marketplace full of choices while sparing consumers from paying for products and features they do not need during a time of affordability challenges.

Conclusion

Consumers today expect to watch the sports they care about wherever they are, whenever they want, and on the devices they choose. Streaming and other technology-driven platforms have expanded access to sports, increased consumer choice, fueled the growth of women’s and niche sports, and helped fans follow teams and leagues far beyond traditional broadcast boundaries.

This competitive and innovative marketplace works because it responds directly to consumer demand. Consumers benefit from more viewing options, more flexibility, more affordable choices, and more ways to discover and engage with the sports and content they value most.

The FCC should preserve this consumer-driven evolution by maintaining a voluntary transition to ATSC 3.0 and avoiding mandates that would increase costs and force consumers to pay for technologies they may not want or use. Consumers—not government mandates—should decide how the future of sports viewing evolves.

Respectfully submitted,

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³³ NAB Reply Comments at 14.