

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter Of)	
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Inquiry Concerning the Deployment of Advanced)	
Telecommunications Capability to All Americans)	
In a Reasonable and Timely Fashion, and Possible)	GN Docket No. 09-137
Steps to Accelerate Such Deployment Pursuant to)	
Section 706 of the Telecommunications Act of)	
1996, As Amended)	
)	
International Comparison and Survey Requirements)	GN Docket No. 09-47
In the Broadband Data Improvement Act)	
)	

COMMENTS OF NEWS CORPORATION – NBP PUBLIC NOTICE # 26

News Corporation (“News Corp.”) hereby responds to the Commission’s Public Notice released December 2, 2009, entitled “Data Sought on Uses of Spectrum (NBP Public Notice #26).” News Corp. applauds the FCC for its comprehensive and aggressive efforts to develop a national broadband plan that ensures America’s competitiveness in the global marketplace of information and entertainment. We recognize the need to utilize spectrum for wireless applications, especially in rural areas where broadband deployment is lacking. Fortunately, *broadcasters are uniquely situated to be a part of the mobile broadband solution.*

BROADBAND+BROADCAST

News Corp. has been working for almost two years to develop a mobile content delivery platform that promises to play a vitally important and complementary role in the national broadband rollout.

News Corp. is currently using the majority of its broadcast spectrum to deliver high definition television programming to viewers. With the remaining broadcast spectrum, we plan within the next two years to roll out a robust, innovative offering on this mobile content delivery platform. This offering is slated to include local and national, print and video, news, sports and entertainment content that would be delivered to a variety of mobile devices including, potentially, smart phones, e-readers, laptops and net books.

Through this mobile content delivery platform, consumers will be able to access their content when and where they want it, through whatever device they happen to be using at the time, creating an aggregated, personalized, comprehensive offering. For example, consumers will be able to watch breaking news wherever they may be, watch their favorite football team live in the back seat of their cars, get the latest news, weather and traffic while riding the train or bus to and from work, catch up on their favorite TV shows while waiting for their daughter to finish soccer practice, watch their favorite movies while away from home, and read a variety of newspapers, magazines or books – some enhanced with video content – while traveling on business.

This all can be accomplished through the most spectrally efficient, cutting-edge technology available for the wireless delivery of vast quantities of popular video and print content on a personal portable device: broadcasting.

A “one-to-many” broadcast network is far more efficient than the “one-to-one” architecture of IP-based broadband services when it comes to delivering bandwidth-hogging popular content. Rather than delivering *American Idol* 26 million times to the 26 million viewers who watch this show AT THE SAME TIME, on average, in a given week, a one-to-many broadcast network could transmit *American Idol* once to mobile devices, using a tiny fraction of

the bandwidth at a tiny fraction of the cost than would be required for millions of one-to-one deliveries. For any popular content that millions of consumers want to enjoy, broadcast is irrefutably the most efficient delivery mechanism available.

Of particular interest to national and local security, a mobile content delivery platform through broadcast can provide emergency information at the same time to millions, or hundreds of millions, of Americans during a natural or man-made disaster, saving lives that otherwise could be lost because individuals and families are unable to get timely information.

Broadband excels at providing data and content on-demand to individuals. However, broadband is not a practical method, now or in the future, of delivering large quantities of popular video or other content on a wide-scale basis to today's on-demand consumers.

In fact, if an engineer were asked today to construct, from scratch, a system for providing vast quantities of information and entertainment to hundreds of millions of consumers, the system would include both one-to-one and one-to-many components. Fortunately, through the broadcast industry's innovation, we have the technology in place today to enable both types of networks to efficiently and effectively coexist: broadband+broadcast.

News Corp.'s planned mobile content delivery platform is an attempt to reinvent and recreate the content experience from the ground up. Who better to work toward developing and delivering this innovative new experience than a media company such as News Corp., with expertise in programming a wide array of platforms: broadcast, cable, satellite, mobile and the Internet? And who better than a company that has a long history of reinventing the media world, through the development of FOX as the fourth broadcast network, the launch of the Fox News Channel to compete with CNN and the Fox Regional Sports Networks to compete with ESPN,

the introduction of National Geographic Channel to compete with Discovery, and the creation of an innovative Internet video platform like Hulu?

The current vision of News Corp.'s mobile content delivery platform can be summarized as follows: the foundation of any offering would be local news, weather and traffic, available at the touch of an icon on a smart phone or other mobile device's screen. It could provide information about a consumer's town, state, country and world. Users would be able to sort through news stories to find those of greatest interest, and to save stories to view or share later. News could be delivered in the form of either text-based stories to read, video to watch, or both. The platform could include automatic alerts when urgent information needs to be conveyed, such as a child abduction near a neighborhood school, or a fast-approaching blizzard, tornado or hurricane. All of these alerts would be capable of providing a consumer with immediate information about evacuation routes, safety measures that may need to be deployed, or ways of getting in touch with family members when cell phone service fails because of the high volume of calls during emergencies. This is all information that, in the past, was available only if a consumer was tethered to a TV set in the home.

Other offerings could be built to complement this foundation of news and information, from a vast array of sporting events, to prime time TV shows and kids programming, movies, to celebrity interviews and craft demonstrations, to books, magazines, newspapers and more. Consumers would have access to the best content, delivered in ways that are personally tailored to consumers on the go, all through the touch of an icon on a screen, with short-cuts to favorite shows, alerts when new episodes are available, and recommendations to try something new from favored genres, actors, producers or writers.

In addition to these on-demand types of offerings, content would be available live, when live counts: breaking news, the inauguration of the President, football, baseball, the latest winner of *American Idol* or plot twist in *Glee*. These same mobile devices, enabled with broadband back-channels, would be able to search the Internet, check MySpace or Facebook pages, go to Hulu to get compelling content on-demand, or check email. And they would be able to do both without the fear of jammed circuits, crashed sites, or technological glitches, all because of the proven reliability of the broadcast service, its fundamental technological underpinnings, and its decades of experience delivering valuable content to hundreds of millions of Americans at the same time. If each is allowed to do what it does best in this new mobile world, broadband+broadcast will provide consumers with the best possible system for conveying news, information and entertainment.

News Corp.'s mobile content plans are still under development, as we are taking the time to optimize this content offering to ensure that we are offering consumers the news, information, sports and entertainment they most want, when they want it, and how they want it. Smart phones appeared on the market just two-and-a-half years ago, so this technology, and consumers' use of it, is still in its infancy. Now that a mobile TV technical standard has been developed around the existing ATSC standard (ATSC-MH), we are working with other companies to aggregate spectrum, get chips into mobile devices, and get wireless carriers to offer our innovative content platform to consumers throughout the U.S. With the emergence of this mobile content platform, broadband+broadcast is clearly the most efficient way to utilize the country's valuable spectral resources. The combination of broadband's one-to-one, and broadcast's one-to-many, will make for a powerful, robust and spectrally efficient one-two punch for offering information and entertainment nationwide.

The benefits to the public of broadband+broadcast are obvious: it promises hands down the greatest potential for transporting the greatest amount of information and entertainment to consumers in the most efficient manner possible. It also offers the potential to breathe new life into many of the nation's newspaper, book and magazine publishers, by providing them with an innovative new platform for delivering journalism. And it offers the opportunity to reinvent the broadcast service by democratizing the availability of content of all types to consumers everywhere, no matter whether they live in the city, the country, or somewhere in-between. The potential to provide a diverse, personalized, comprehensive offering to each and every consumer is breathtaking. Equally exciting is that broadband+broadcast deployment can be achieved in a relatively short time frame, through a technological infrastructure that largely is already in place, with antennas that already are built and transmitters already deployed. The broadcast spectrum is already in the hands of those who are best able to reinvent the content experience for our increasingly mobile-literate society: television broadcasters.

In short, broadband+broadcast does not require wholesale government intervention, massive upheaval, or a redistribution of resources. Broadband+broadcast holds the promise for ushering the United States into the next generation of information and entertainment offerings, allowing the country to solidify its place as an international leader.

Respectfully submitted,

NEWS CORPORATION

By: /s/
Maureen A. O'Connell
Senior Vice President, Regulatory and
Government Affairs
News Corporation
444 N. Capitol Street, N.W.
Washington, D.C. 20001
(202) 824-6502

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