



NATIONAL FOOTBALL LEAGUE

Via ECFS

April 21, 2026

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20054

**Re: Sports Broadcasting Practices and Marketplace Developments –
MB Docket No. 26-45**

Dear Ms. Dortch:

This letter is being submitted to notify you that on April 17, 2026, Ted Ulyot, Hans Schroeder, Jeff Miller, and the undersigned from the National Football League (“NFL”) met with Greg Watson (Chief of Staff to Chairman Carr), Allison Howell (Attorney Advisor to Chairman Carr), and Evan Morris (Deputy Bureau Chief of the Media Bureau), to discuss the NFL’s media distribution approach for its live games and how it benefits fans and local broadcasters in many ways.

Since its founding, the NFL has strived to put its fans at the center of everything we do. Nowhere is that more evident than in the NFL’s media distribution strategy, which for more than 50 years has served as a foundation and catalyst for the League’s growth and popularity. While nothing can replace the excitement of attending a game, the vast majority of fans rely on this media distribution model to watch live games and follow the sport they love.

With the goal of reaching as many fans as possible, the NFL has relied on free, over-the-air broadcast television as the primary means of distributing our games. For many years, 100% of NFL games have aired on broadcast television in the home markets of the competing teams. Most of those games are distributed to a significantly broader geographic area, if not nationally. Our contracts with ABC, CBS, Fox and NBC account for the distribution of more than 87% of all NFL games, a number that has varied little in the past two decades. This distribution model is good for our fans, for local television broadcasters, for our 32 clubs in small and large markets alike, and for the competitiveness of the game itself. The success of our fan- and broadcast-friendly strategy is evident as the 2025 season was the most viewed since 1989 and one of the most competitive in League history.

The attached presentation, which we discussed with the FCC attendees, captures these points and details the NFL’s media distribution policy – a model which can only be judged as the most fan- and broadcaster-friendly in the entire sports and entertainment industry.



NATIONAL FOOTBALL LEAGUE

Please direct any questions to the undersigned.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Brendon Plack'.

Brendon Plack
SVP, Public Policy and Government Affairs

Enclosure

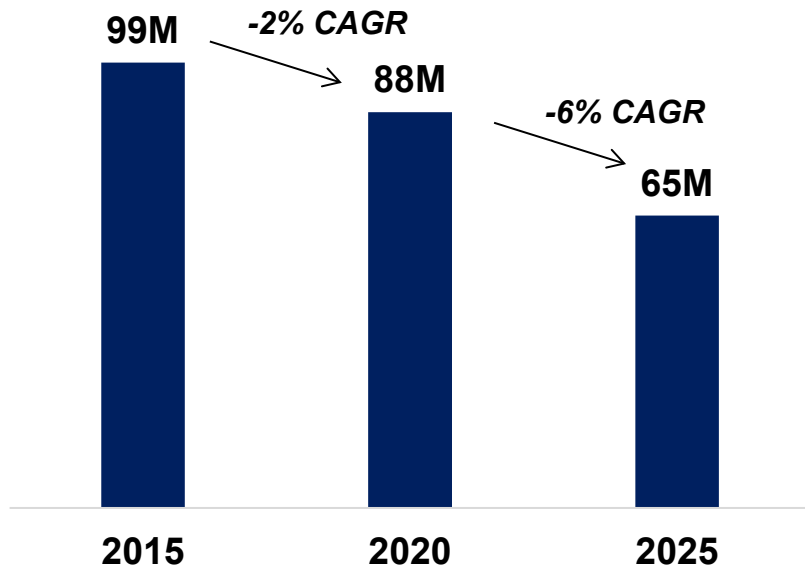
cc: Greg Watson
Allison Howell
Evan Morris



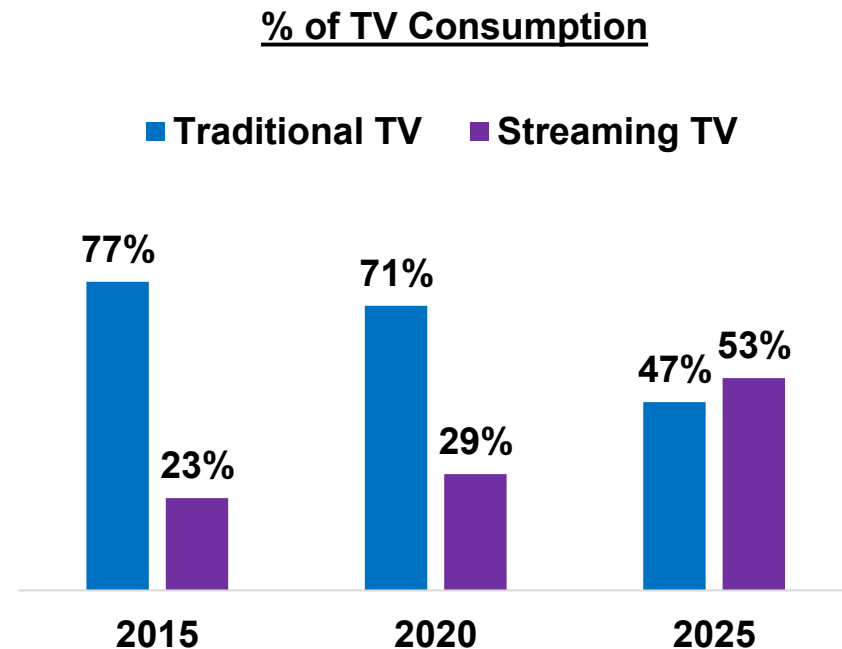
NFL Media Overview

April 2026

Pay TV households Continue Decline



Digital Engagement Continues to Grow



NFL Media Distribution Approach



- **GOOD FOR FANS:** Most fan-friendly media distribution of all sports at any level.
 - Over 200 million fans in the U.S.
- **GOOD FOR LOCAL BROADCASTERS:** Viewership + Advertising = Lifeline for many local broadcasters
- **GOOD FOR THE GAME:** Unmatched competitive balance on the field
- **GOOD FOR TEAMS IN ALL MARKETS:** Teams and fans in smaller markets and larger markets



NFL Distribution Approach: Good for Fans



100%

of local market games free over-the-air

- Broadcast-led distribution model unique... no other sports League distributing games this way

87%

of NFL games' primary distribution is on broadcast

- Share of games distributed on broadcast television has been very similar over last 15 years

With a \$19.99 digital antenna, NFL fans get more content than any other league or level of sports

“No sport is more affordable than the NFL due to its complete availability on free, over-the-air broadcast TV.”

(Lightshed Partners, March 4, 2026)

“And to be fair, they're the best sport in terms of a consumer experience. As a local fan, as a Commanders fan, a Giants fan, I know I'm going to be able to watch my games over the air wherever I want. I know that the majority of the content I watch is free – if I wanted to watch it free – over-the-air.”

(Michael Nathanson, April 12, 2026)



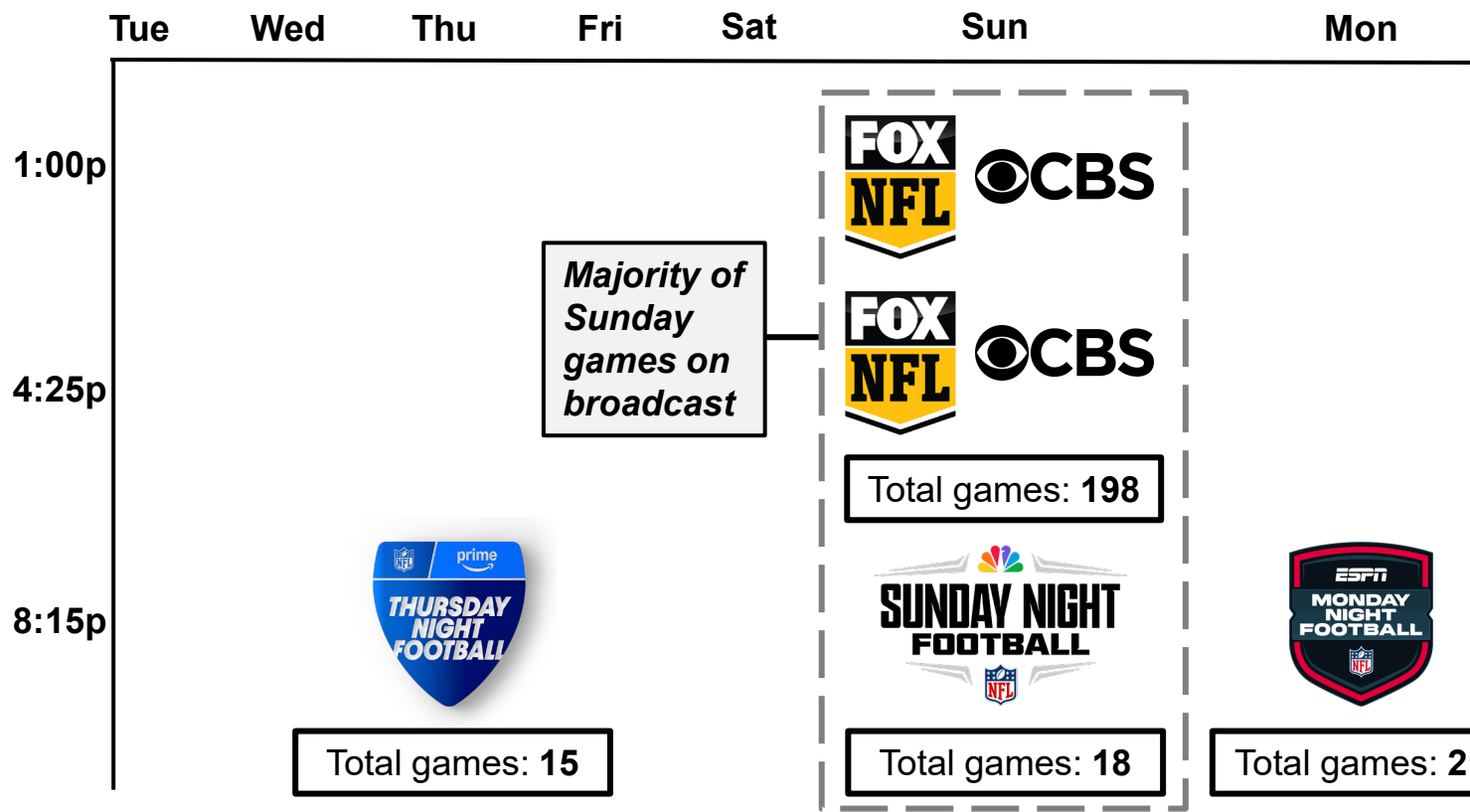
2025-26 Regular Season Viewership (Season-Long Packages)

Game Package	2024	2025	YoY	
Amazon TNF	13.2M	15.4M	+16%	<i>All time high</i>
CBS Sunday	19.2M	21.3M	+11%	<i>All time high</i>
FOX Sunday	18.4M	19.6M	+6%	
NBC SNF	21.3M	23.5M	+11%	<i>All time high</i>
ESPN MNF	14.5M	16.5M	+13%	
NFL Network ⁽¹⁾	7.5M	7.6M	+0.1%	

**All partners up year-over-year... 2nd highest season on record...
most-watched regular season since 1989**

Nielsen measurement includes digital viewership (where TV ads are passed through). TV + Digital deduplicated for linear passthrough.
(1) NFL Network and MNF games include over-the-air where applicable

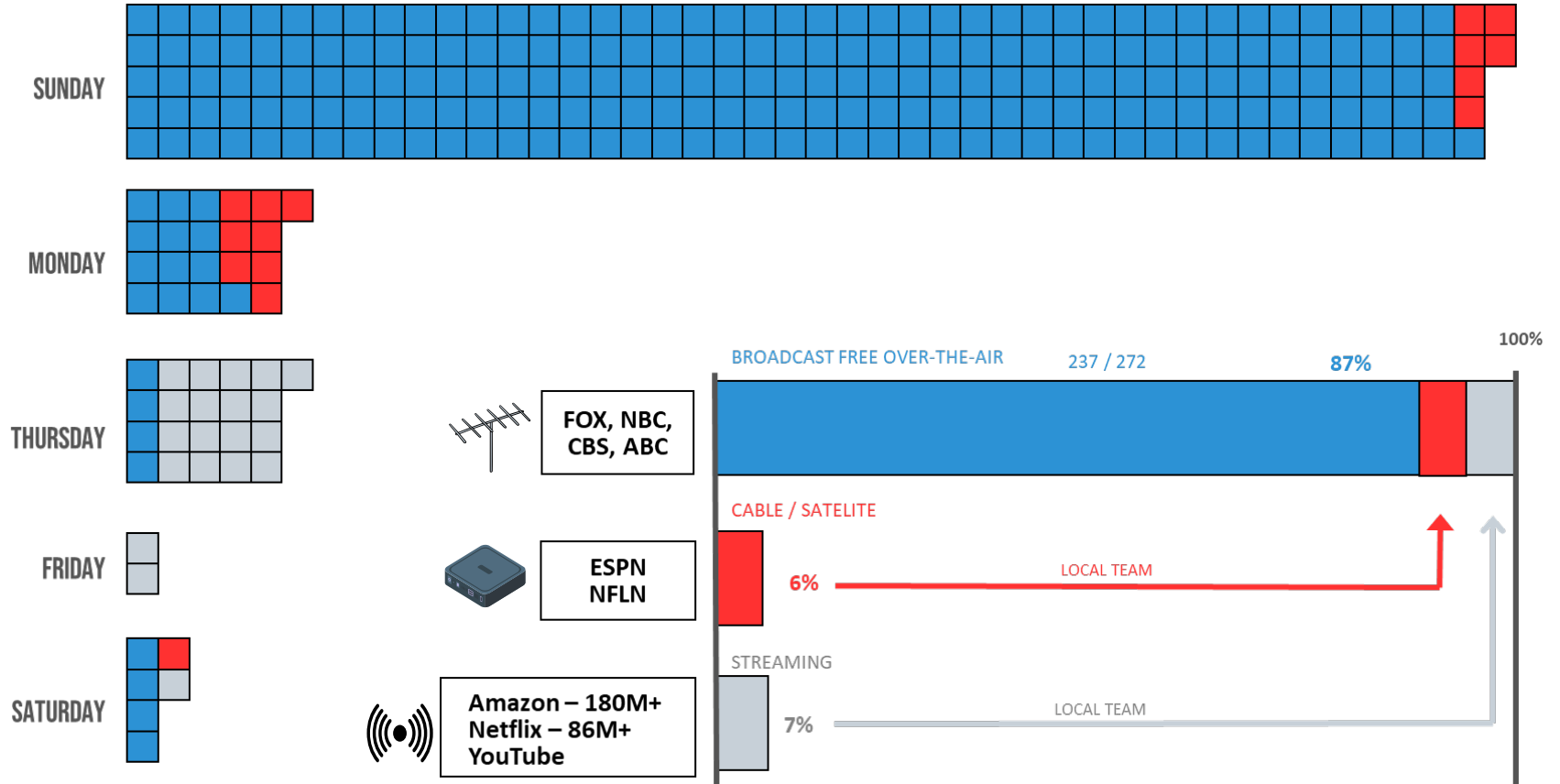
NFL Regular Season Weekly Schedule



- Other Windows:**
- 1 Kickoff (NBC)
 - 1 Friday Week 1 (YouTube)
 - 3 T'giving (FOX/CBS/NBC)
 - 1 Black Friday (Amazon)
 - 2 Christmas Day (Netflix)
 - 4 Dec. Saturday DHs (FOX/ESPN)
 - 1 Dec. Saturday (Peacock)
 - 6 Early int'l & 1 Dec. Sat (NFLN)

Best game into best window for all 272 games... all games free OTA in local markets

Season-Long Viewing



Sunday Afternoon Doubleheaders - Regional



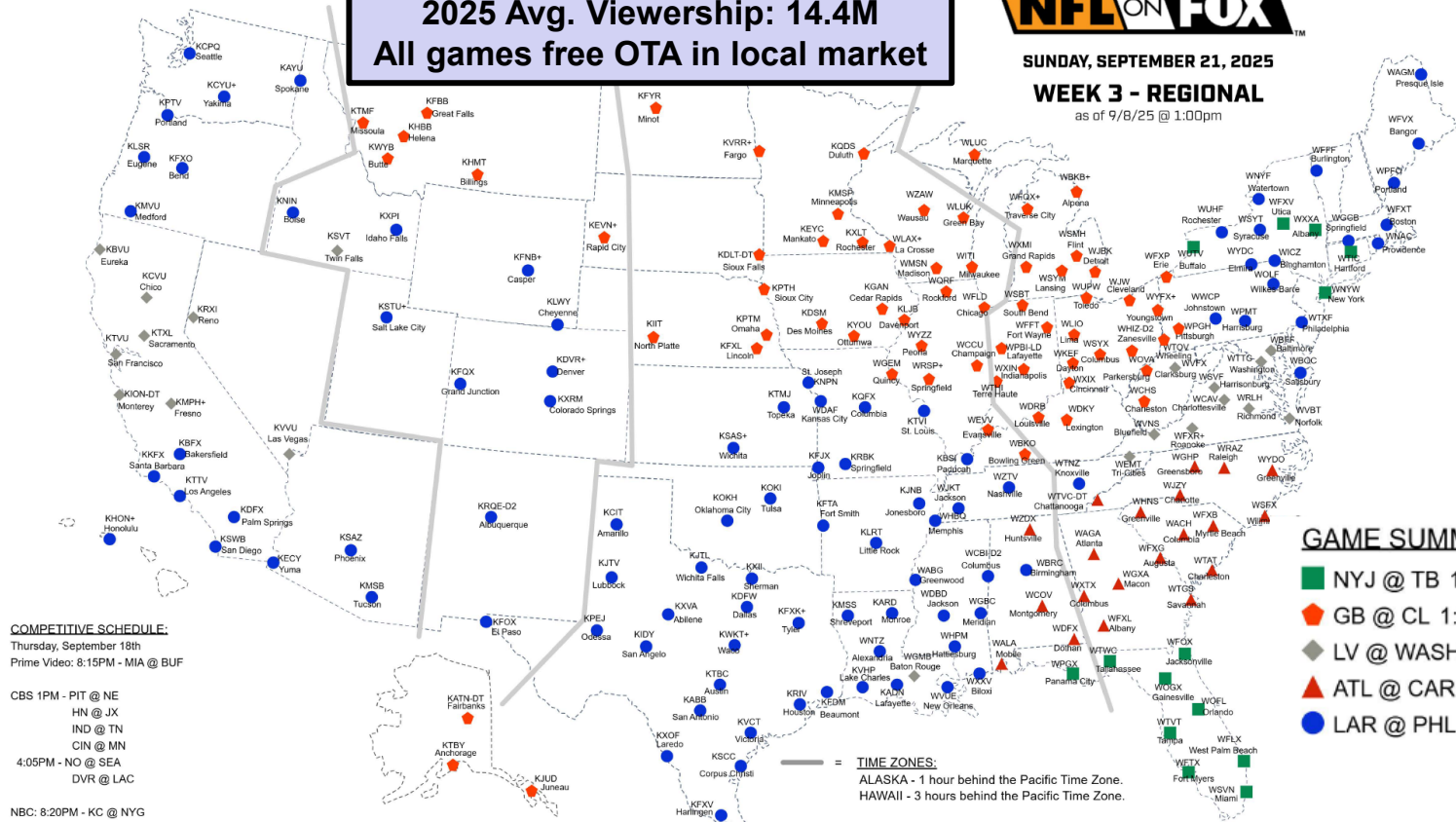
2025 Avg. Viewership: 14.4M
All games free OTA in local market



SUNDAY, SEPTEMBER 21, 2025

WEEK 3 - REGIONAL

as of 9/8/25 @ 1:00pm



Games strategically picked weekly to put most compelling game into each market

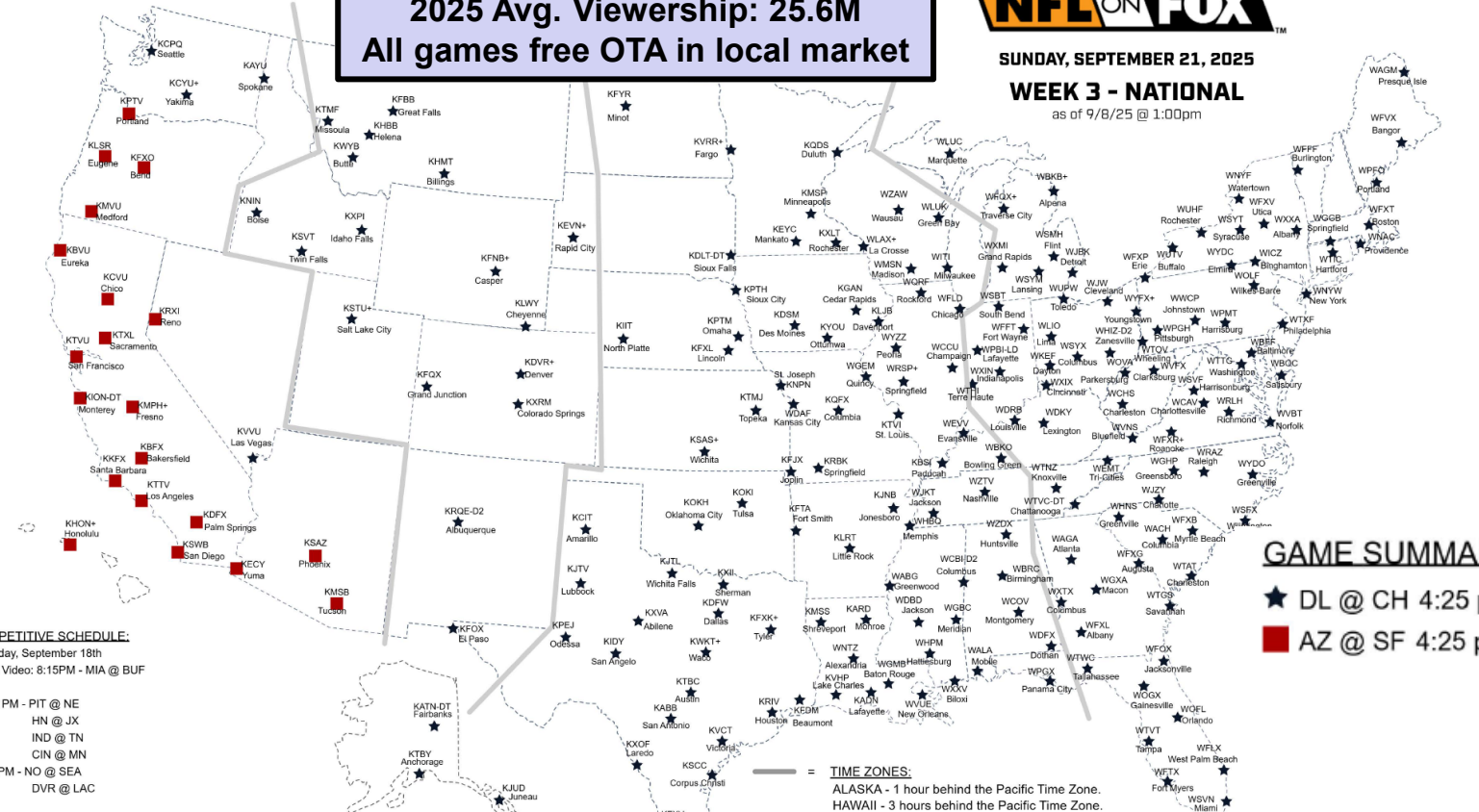
Sunday Afternoon Doubleheader - National



2025 Avg. Viewership: 25.6M
All games free OTA in local market



SUNDAY, SEPTEMBER 21, 2025
WEEK 3 - NATIONAL
 as of 9/8/25 @ 1:00pm



GAME SUMMARY

- ★ DL @ CH 4:25 pm 86% US
- AZ @ SF 4:25 pm 14% US

COMPETITIVE SCHEDULE:
 Thursday, September 18th
 Prime Video: 8:15PM - MIA @ BUF

CBS 1PM - PIT @ NE
 HN @ JX
 IND @ TN
 CIN @ MN
 4:05PM - NO @ SEA
 DVR @ LAC

— = **TIME ZONES:**
 ALASKA - 1 hour behind the Pacific Time Zone.
 HAWAII - 3 hours behind the Pacific Time Zone.

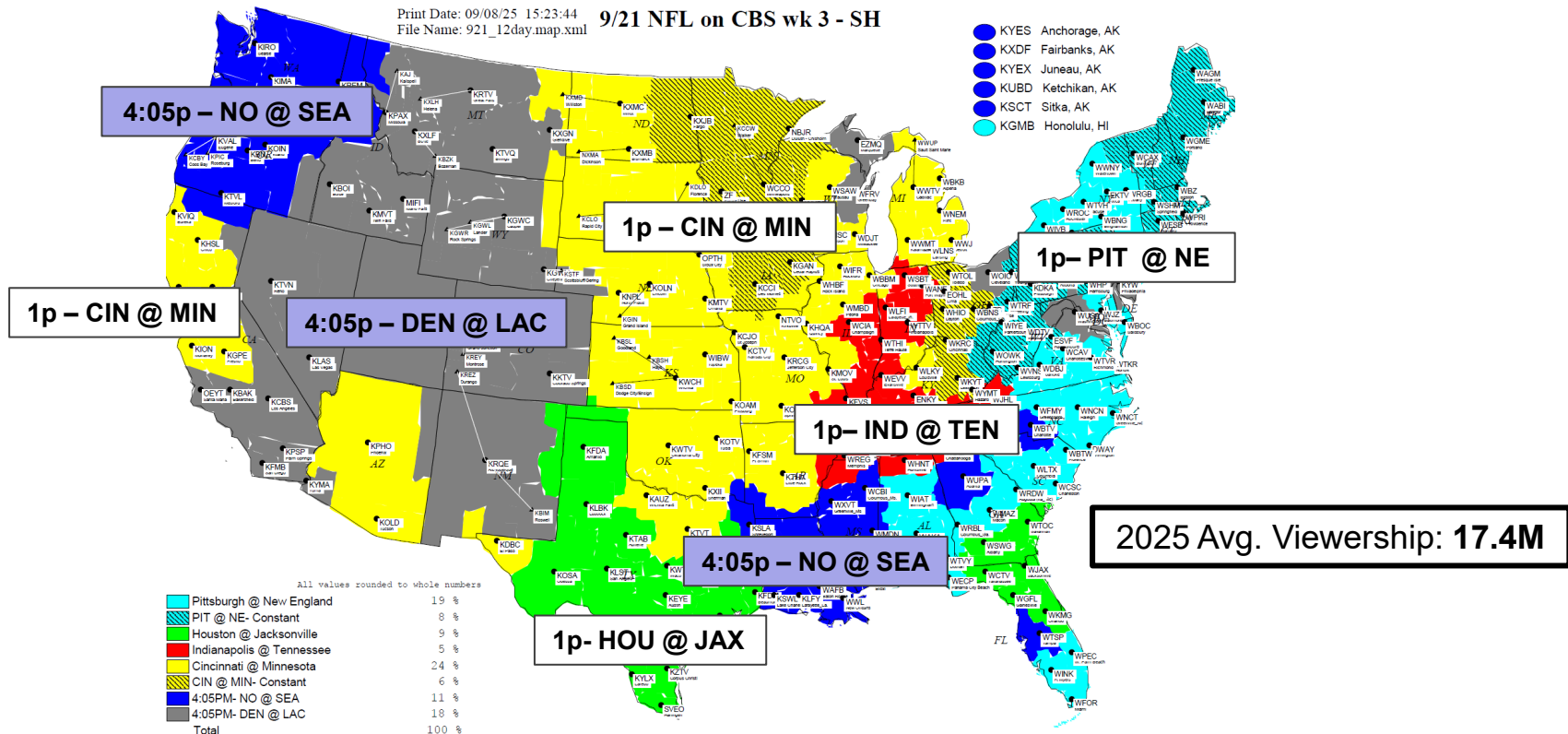
Games strategically picked weekly to put most compelling game into each market

Sunday Afternoon Singleheaders



Print Date: 09/08/25 15:23:44 9/21 NFL on CBS wk 3 - SH
 File Name: 921_12day.map.xml

- KYES Anchorage, AK
- KXDF Fairbanks, AK
- KYEX Juneau, AK
- KUBD Ketchikan, AK
- KSCT Sitka, AK
- KGMB Honolulu, HI



All games free OTA in local market

Same selection process for singleheaders... accounts for local time differences

Sunday Night



- Compelling matchups...

14 *out of 14 teams that appeared
in the NFL Playoffs in 2024*

- ... driving big audiences on NBC

15 *consecutive years as #1 show
in Primetime*



Sunday closes with competitive game on NBC broadcast network

Cable + Digital Distribution



ESPN MNF (Cable)



8 regular season games...

... added broadcast distribution with simulcasts



'25 Standalone Windows

ABC/ESPN - 19.7 avg. viewers

ESPN - 13.3M avg. viewers

Amazon TNF



16 regular season games...

... on platform with ~180M subscribers

15.4M avg. viewers in '25

Netflix & YouTube

NETFLIX



Free

3 regular season games...

... on scaled platforms ~85M Netflix U.S. subs / ~255M YT U.S. MAUs

Netflix: **23.7** avg. U.S. viewers in '25
YouTube: **18.5** avg. U.S. viewers in '25

All games free OTA in local market

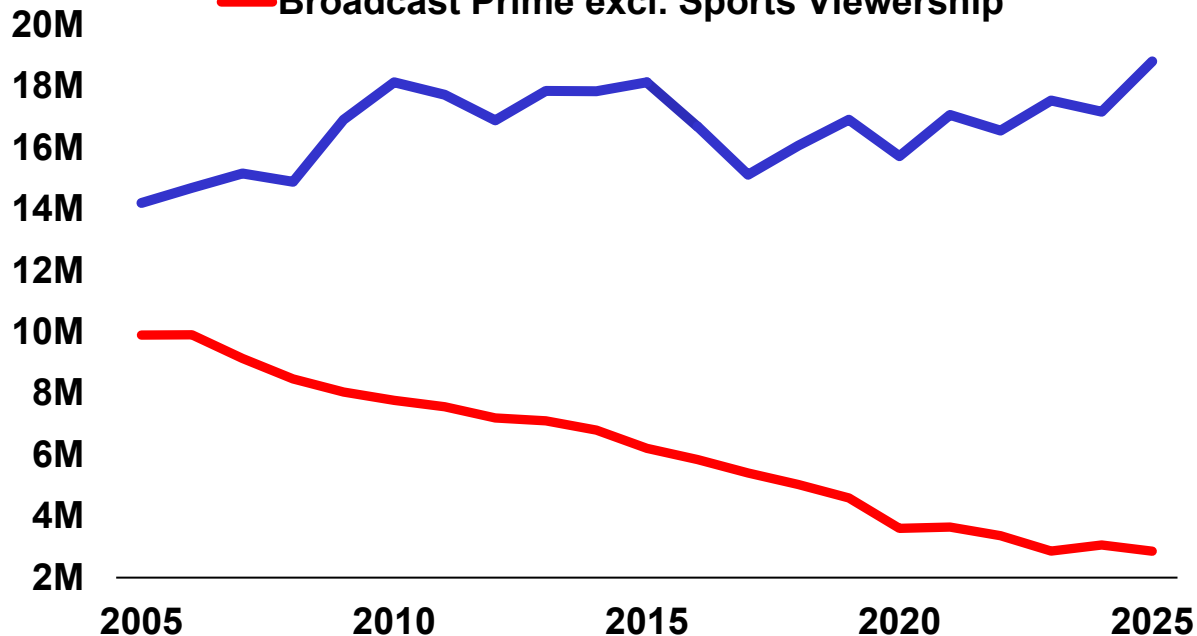
Selective distribution on already widely-distributed platforms

NFL Media Distribution Approach: Good for Broadcasters



NFL Viewership vs. Broadcast Prime

- NFL Regular Season Viewership
- Broadcast Prime excl. Sports Viewership



Broadcast + NFL

100%

of local market games free OTA

87%

of NFL games' primary distribution is on broadcast

86

of top 100 TV programs in 2025 were NFL Games

Broadcast still important to NFL... and NFL contributes to maintaining broadcast television

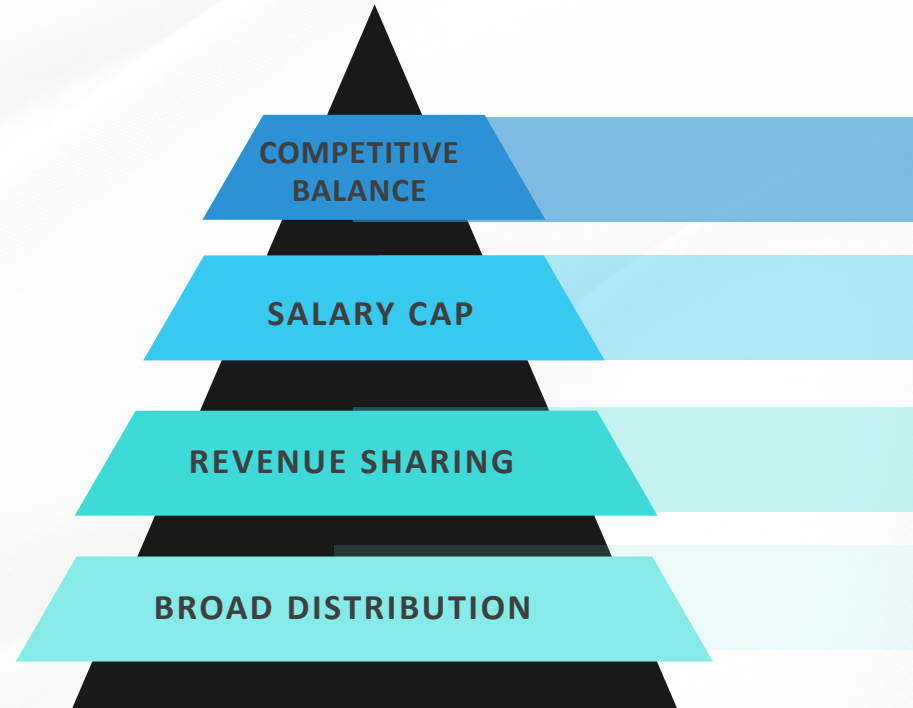
NFL brings significant benefits to local broadcasters:



- “No other sports league has replicated the NFL’s broadcast-centric model...”
(Lightshed Partners, March 4, 2026)
- Highest Viewership = More Advertisers
- Promotes other programming by leading into other shows, which lifts viewership
- Enables network to invest in and offer other sports, news, programming, & community affairs

NFL's media distribution approach supports the foundation of on-field competitive balance across the NFL, which has never been greater

- In 2025, 73 games were decided by three points or fewer, tied for the most in a season in NFL history.
- Approximately 70 percent of games were within one score in the fourth quarter.
- **Fan-Friendly Media Deals + Competitive Balance = 2025 Highest Viewership in 36 years**



Without Leaguwide Media Deal = Higher Costs and Confusion



32 team media deals

=

32x the fractured media
landscape

Higher consumer costs



THANK YOU

