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

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

REPLY COMMENTS OF RYAN KELLERMEYER

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I. Introduction

I am an NFL fan in Marion, Indiana, and the founder of HuddleMaxx, a consumer software tool that analyzes NFL broadcast schedules and tells fans exactly which streaming services they need, which months to subscribe, and when to cancel — because the current marketplace has made it impossible to figure this out on your own.

I write in response to comments filed in this proceeding, and in particular to the assertion by the Consumer Technology Association ("CTA") that the Commission "should not interfere with today's dynamic, highly competitive and ever-evolving sports video marketplace."

I agree with the CTA on one point: this marketplace is certainly dynamic. It is so dynamic that last season, as an out-of-market Philadelphia Eagles fan, I paid for Sunday Ticket — the product marketed as the solution for out-of-market fans — and discovered it didn't cover over half the Eagles games because they aired on national broadcast windows. For the games Sunday Ticket didn't cover, I would have needed Peacock, ESPN Unlimited, Amazon Prime, FOX One, and Paramount+ — five additional services, each carrying a handful of my team's games across different weeks. It is so dynamic that I had to build software just to figure out which services I actually needed and which months to subscribe. When I ran the numbers, the year-round cost of covering every Eagles game came to $937. The HuddleMaxx optimizer brought it down to $403.

The CTA characterizes this as a marketplace that is working. I would respectfully suggest that a marketplace where consumers need an optimization algorithm to stop overpaying by 57% is not, in fact, working.

II. The CTA's "Highly Competitive Marketplace" — As Experienced by an Actual Consumer

The CTA urges the Commission to credit streaming platforms for "giving fans more access to their favorite teams." Let's examine what that access looks like in practice.

In the 2025 NFL season, Eagles games aired across seven different platforms. Not all at once, of course — that would be too simple. Each platform carried specific games, on specific weeks, with broadcast assignments that shifted based on national scheduling windows, local market protections, and exclusive streaming rights that varied by day of the week. Thursday games were on Amazon. Select Saturday games were on NFL Network. Monday games were on ESPN. Sunday night was Peacock or NBC. Christmas was Netflix. And the Sunday afternoon games — the ones most fans think of when they think of "watching football" — were split between CBS, Fox, and YouTube TV, with assignments determined by conference matchups and local affiliate coverage maps that no consumer has any reason to understand.

I paid $349 for Sunday Ticket, marketed as the way for out-of-market fans to watch their team. It did not cover over half the Eagles games. Most of them aired on national broadcast windows — meaning I was already paying for them through other services. Sunday Ticket discloses in general terms that nationally televised games are excluded — but no service shows a consumer, before purchase, how many of their specific team's games will actually be available. I had no way to know that over half the Eagles games would be blacked out until I mapped the schedule myself.

This is the marketplace the CTA is asking the Commission to leave alone.

III. What 8,500 Consumers Already Told the Commission

More than 8,500 comments have been filed in this docket. The Commission does not need me to tell it that consumers are frustrated — the record speaks clearly on that point.

What I can add is data. After building HuddleMaxx, I ran the optimizer across all 32 NFL teams for the 2025 season. The findings are consistent:

- **The average fan needs five to six streaming services to watch a full season** of one team. Not all 32 teams. One team.
- **Each service is typically needed for only two to three months**, not twelve. The subscribe-all-year default that every streaming platform encourages represents hundreds of dollars in annual waste per household.
- **Approximately 88% of NFL regular season games still air on free over-the-air broadcast television.** For fans living in their team's home market, a $30 antenna covers the majority of the schedule. Yet not one streaming service, league schedule page, or media rights holder communicates this to consumers.

- **Sunday Ticket, at $349 per season, provides full value only for a narrow subset of fan situations.** For many teams and markets, the majority of games are nationally televised and therefore blacked out on Sunday Ticket — meaning the fan has paid for a product that doesn't deliver what was advertised.

The CTA calls this "highly competitive." Competition implies consumers can make informed choices between alternatives. That requires knowing what each alternative actually provides for your specific team and location. Today, that information does not exist in any consumer-accessible form. The streaming marketplace does not compete on transparency. It competes on confusion. And confusion is extremely profitable.

IV. The Broadcaster Filings Have It Right — But Incomplete

The National Association of Broadcasters, Fox Corporation, and Sinclair, Inc. each filed comments identifying real and serious harms in the current marketplace. I agree with the substance of their concerns and would add the following observations from a consumer perspective.

The NAB cited NFL viewership data from Thanksgiving Day 2025, when games on CBS, Fox, and NBC averaged 44.7 million viewers — demonstrating that free over-the-air broadcast remains the most effective distribution channel for live sports. The NAB is correct, and the consumer data supports this: most fans' schedules are still predominantly broadcast games. The problem is that fans don't know this, and the streaming marketplace has no incentive to tell them.

Fox Corporation argued that the Sports Broadcasting Act's antitrust exemption should not extend to subscription streaming services where content is not freely accessible. From a consumer standpoint, this distinction matters enormously. The SBA was designed to ensure broad public access to professional sports. A marketplace where 21 NFL games are locked behind four different paywalls — each requiring a separate subscription — is not broad public access. It is the opposite of what the SBA was intended to protect.

Sinclair noted that 96 of the top 100 telecasts in 2025 were sports events, and warned that migration to streaming threatens the local news operations that depend on sports as audience lead-ins. I would add that this same migration is severing a relationship that consumers relied on — turning on the local channel and finding the game. That experience is disappearing, and nothing in the streaming marketplace has replaced it with comparable simplicity.

Senators Warren and Ryan wrote to the Commission highlighting concerns about consolidation and rising costs. The consumer data bears this out. The streaming marketplace is not lowering costs through competition. It is multiplying costs through fragmentation — and profiting from the complexity.

V. The Existence of HuddleMaxx Is the Evidence

I want to be clear about something: HuddleMaxx should not need to exist.

No consumer should need an algorithm to answer the question, "Where is my team's game on Sunday?" No household should need optimization software to avoid paying twice for the same broadcast. The fact that a tool like this has a market — that fans are grateful for software that tells them how to stop wasting money — is itself the most damning evidence of marketplace failure the Commission could ask for.

The CTA's position amounts to: the market is working, consumers have more choice than ever, and the Commission should stand down. I built a company that exists solely because the CTA is wrong on all three counts. Consumers do not have more choice. They have more confusion. And they are paying for it.

VI. What the Commission Should Consider

At minimum, this marketplace should operate with basic transparency. I respectfully suggest the Commission consider the following:

1. Require broadcast transparency for media rights holders. Leagues and streaming services should be required to provide clear, accessible, machine-readable schedule data showing which games air on which platforms in which markets. Today, even official API data frequently misidentifies broadcast assignments for future games. Consumers cannot make informed subscription decisions when the underlying schedule data is scattered, inconsistent, and often wrong.

2. Formalize the local simulcast requirement. The NFL's current practice of requiring streaming-exclusive games to simulcast on local broadcast stations in competing teams' markets is a meaningful consumer protection. This should be examined as a condition of the SBA's antitrust exemption — not left to private contractual arrangements that could be modified or eliminated at any time.

3. Support consumer awareness of free broadcast availability. The single most impactful thing the Commission could do for consumers is help them understand what they already have access to for free. 88% of NFL games air on broadcast television. A significant portion of the 8,500 comments in this docket likely come from fans in their home market who do not know this.

I have compiled a list of 23 articles from major national publications covering this proceeding and the broader streaming fragmentation crisis, available at https://huddlemaxx.com/articles. The breadth of press coverage — from Semafor to NBC Sports to Fox News to Sportico — reflects the depth of consumer harm.

VII. Conclusion

The CTA told the Commission that this marketplace is dynamic, competitive, and working. I discovered it would cost $937 a year to watch every Philadelphia Eagles game, that an algorithmic sports streaming optimization engine could cut that to $403, and built HuddleMaxx to make sure no fan has to overpay like that again.

Over 8,500 Americans wrote to this Commission to say the same thing I am saying, just without the optimizer data to prove it. They deserve better than a marketplace that profits from their confusion, and they deserve a Commission that takes their frustration seriously — regardless of what the industry's trade association has to say about it.

Respectfully submitted,

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