

The O Team

1350 I Street Northwest Suite 250, Washington, District of Columbia 20005, United States

(301) 502-8772

**VIA ELECTRONIC FILING (ECFS)**

Marlene H. Dortch, Esq., Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: Notice of Ex Parte Presentation  
GN Docket Number 18-122

Dear Ms. Dortch:

This letter is to report on ex parte presentations made on September 30, 2019 and October 2, 2019 by two representatives of Educational Media Foundation ("EMF") and the undersigned. EMF was represented by Randall Badeaux (a/k/a Randy Chase), EMF's Vice President for Radio, and Sam Wallington, EMF's Director of Operations and Engineering. The meetings were held with the following individuals:

First Meeting, September 30:  
William Davenport, Office of Commissioner Starks

Second Meeting, September 30:  
Commissioner Michael O'Rielly and his Chief of Staff Joel Miller

Third Meeting, October 2:  
Aaron Goldberger, Office of Chairman Pai

Fourth Meeting, October 2:  
Will Adams, Office of Commissioner Carr

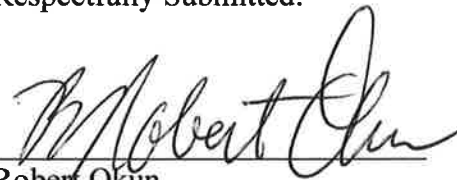
Fifth Meeting, October 2:  
Commissioner Jessica Rosenworcel and Kate Black and Umair Javed of her office

The principal topic discussed in each of these meetings was the proposal to use some of the current C-Band spectrum for 5G spectrum purposes. EMF currently makes significant use of C-Band satellites to distribute its programming to many of its hundreds of stations and translators across the country and to affiliated stations. Any significant required change in its current operations would impose significant costs on EMF, which is a non-profit religious foundation. The representatives of EMF made the following key points in each meeting:

- Changing polarization of the satellite signals to protect wireless uses would be costly and could cause significant disruptions to listeners.
- Fiber as a substitute for satellite delivery of content has real drawbacks as fiber requires a point to point connection, requires multiple contracts with multiple vendors, and is not as easily deployed to rural listening areas where EMF has many broadcast stations.
- If there is to be an auction, EMF favors the fastest and most transparent approach
- Broadcasters need to have all of their costs reimbursed if current operations are disrupted.

Please contact the undersigned with any questions.

Respectfully Submitted:

  
Robert Okun  
President, The O Team

cc: William Davenport  
Commissioner O'Rielly  
Joel Miller  
Aaron Goldberger  
Will Adams  
Commissioner Rosenworcel  
Kate Black  
Umair Javed