



October 7, 2019

*Via Electronic Filing*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: Expanding Flexible Use of the 3.7-4.2 GHz Band, GN Docket No. 18-122, Ex Parte Notice

Dear Ms. Dortch:

Pursuant to Section 1.1200, et seq., of the Commission's Rules, National Public Radio, Inc. ("NPR") hereby notifies the Commission of the following *ex parte* presentations in the above-referenced proceeding. On October 3, 2019, Michael Beach, Vice President for Distribution, Joni Lupovitz, Senior Director for Public Policy, and the undersigned had separate meetings with the following Commission personnel: Will Adams, Legal Advisor to Commissioner Carr; William Davenport, Chief of Staff & Senior Legal Advisor for Wireless and International for Commissioner Starks; Umair Javed, Legal Advisor, Wireless and International for Commissioner Rosenworcel; and Erin McGrath, Legal Advisor, Wireless, Public Safety and International for Commissioner O'Rielly. Also on Thursday, October 3, 2019, the foregoing NPR participants joined by Phil Anderson, of Navigators Global, met with Aaron Goldberger, Wireless and International Advisor for Chairman Pai. NPR requested these meetings in its capacity as manager of the Public Radio Satellite System ("PRSS") and on behalf of all of public radio.

The discussions focused on the attached presentation, which summarizes the public radio system's dependence on C-band satellite spectrum to distribute local and national public radio programming, emergency alerting and public safety information by and among public radio producers and 1,265 local public radio stations, collectively broadcasting to 41 million American listeners weekly. NPR explained that C-band satellite service is essential for public radio because of its availability across the country, including Alaska, tribal areas, and other rural and extremely remote areas; its reliability for live radio programming; and its affordability for reaching hundreds of local communities across the continent and beyond. NPR noted the longstanding and substantial congressional investment in the PRSS, including ongoing current support for a system upgrade. NPR further discussed the practical implications of proposals to reallocate C-band spectrum, and basic requirements to meet public radio needs for available, reliable and affordable means of program distribution going forward. NPR urged the Commission to ensure reimbursement of transition costs as well as any resulting increase in operating costs so that incumbent users are "made whole" in any reallocation of C-band spectrum. NPR referenced its [August 28, 2019 \*ex parte\* filing](#) in the above-referenced proceeding, which highlights FCC precedent over three decades for requiring reimbursement of relocated spectrum incumbents for increased operating costs.

Please direct any questions you may have to the undersigned at 202.513.2050.

Sincerely,

*Gregory A. Lewis /s/*

Gregory A. Lewis  
Deputy General Counsel

cc: Will Adams  
William Davenport  
Aaron Goldberger  
Umair Javed  
Erin McGrath