



January 24, 2019

**VIA ECFS**

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

**Re:** LPTV, TV Translator and FM Broadcast Station Reimbursement, **MB Docket No. 18-214**; Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, **GN Docket No. 12-268**

Dear Ms. Dortch,

The Public Broadcasting Service (“PBS”) has been committed to universal service since its inception almost fifty years ago. That commitment is borne out through the hundreds of low-power television stations and translators that enable free, over-the-air public television service to 38 million Americans in rural and remote communities across the country.

The involuntary displacement of those low-power stations as a result of the broadcast spectrum incentive auction in 2017 threatened to leave many rural communities without access to critical public broadcasting content and services. Fortunately, T-Mobile volunteered to cover the cost for all low-power public television facilities to relocate to new broadcasting frequencies. T-Mobile advanced critical funds to small, locally owned and operated public television stations throughout rural America so that they could continue to deliver curriculum-driven educational children’s content, trusted news and public affairs, and life-saving emergency alerts to the public.

The broadcast facilities that T-Mobile helped save from going dark also serve as the nationwide back-up pathway for the Warning, Alert, and Response Network (“WARN”), which delivers wireless emergency alert messages from the Federal Emergency Management Agency and the Integrated Public Alert and Warning System to mobile wireless carriers nationwide.

Universal service is the core and enduring mission of PBS. It is essential that the Commission implement the funds provided by the 2018 Reimbursement Expansion Act (“REA”) to hold low-power stations and translators harmless so that they can continue to play an essential role in fulfilling PBS’s universal service mission. The REA was intended to make



low-power stations and translators whole for their mandatory relocations to new frequencies. Given the time value of money and the highly resource-constrained nature of local public television stations, PBS (and the Commission's own Widelity Report) have long advocated that the Commission advance funds to public broadcasters and reimburse bridge financing costs. Consistent with that approach, PBS encourages the Commission to consider deploying the REA funds – to the extent they are sufficient to do so – in an equitable way that recognizes third-party advancements for the relocation expenses of eligible translator facilities, without encumbering public television stations with a burdensome and repetitive documentation or certification process to avoid prohibited duplicate payments.

Third-party support to ensure the repacking process moves quickly and smoothly has proven to be an essential component of the post-auction transition. This third-party funding has helped to safeguard public broadcasting's universal service mission, while simultaneously enabling the expeditious rollout of wireless broadband services to rural communities. PBS has always believed that broadcast and broadband platforms have complementary roles to play in educating America's children, informing the American public, and delivering emergency messaging to American communities in times of crisis. The REA should be implemented by the Commission as equitably as possible to support broadcasters and wireless providers in continuing to make good on that mission.

Respectfully submitted,

/s/ Talia Rosen  
Assistant General Counsel  
Public Broadcasting Service