



October 18, 2018

Via Electronic Filing

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

Re: MB Docket No. 18-119; MB Docket No. 18-214; GN Docket No. 12-268 *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* presentation in the above-referenced proceedings. On Tuesday, October 16, 2018, Joni Lupovitz, Senior Director for Public Policy and the undersigned met with the following individuals from the FCC's Audio Division: Albert Shuldiner, Chief; James Bradshaw, Senior Deputy Division Chief; Lisa Scanlan, Deputy Division Chief; and Christine Geopp, Attorney Advisor.

With respect to MB Docket No. 18-119, the parties discussed NPR's opposition to the establishment of a new protected service contour for primary and first in time secondary services beyond which FM translator stations could cause interference without redress, as addressed in NPR's comments in the proceeding. The parties also discussed whether noncommercial educational FM translators operating with reserved FM spectrum should be permitted to change to a different, non-interfering frequency anywhere in the FM band to remedy interference, as NPR also proposed in its comments. Finally, the parties discussed the process for resolving potential interference at the FM translator application stage, including whether a station licensee potentially affected by interference should be required to obtain and submit legal affidavits from potentially affected listeners in support of a challenge to the FM translator application. As explained in greater detail in its comments, NPR recommended relying on engineering criteria in addressing interference concerns at the FM translator station application stage.

With respect to MB Docket No. 18-214 and GN Docket No. 12-268, NPR expressed concern about the significant disruption posed to public radio stations impacted by the television spectrum "repack," and encouraged the FCC to maximize reimbursement so the stations can minimize service disruptions, as set forth in its comments in the proceeding. NPR expressed its opposition to the FCC's graduated reimbursement proposal for radio stations based on time off-air as impractical and unnecessary. If FY 2018 funds designated for radio stations are insufficient, NPR urged the FCC to supplement with FY 2019 funds appropriated for the Repack Reimbursement Fund. NPR also encouraged the FCC to provide reimbursement for project management costs so that affected, but under-resourced, radio stations are able to obtain the expert help they need to mitigate service disruptions and participate in the FCC cost reimbursement process.

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: Mr. Shuldiner
Mr. Bradshaw
Ms. Scanlan
Ms. Goepf