April 14, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte Communication, GN Docket No. 16-142

Dear Ms. Dortch:

On April 12, 2017, Alison Neplokh and the undersigned, both of the National Association of Broadcasters (NAB), met with Michelle Carey, Martha Heller, John Wong, Brendan Murray, Kevin Harding, Evan Baranoff, and Kim Matthews of the Media Bureau and David Konczal of the Office of General Counsel. During the meeting, NAB discussed the two proposals the Commission has set forth regarding the potential regulatory treatment of local simulcasting arrangements stations will use to deploy the Next Generation TV transmission standard – separately licensed simulcasting or a multicast approach.[1]

NAB discussed advantages and disadvantages of each proposal, and explored an alternative approach based on modifying a station's existing license. In contrast to creating a separate license, an alternative may be to re-scope a broadcaster's license to include its transmissions on a simulcast partner's spectrum while excluding the simulcasting partner's transmissions on its spectrum. An approach along these lines could provide both certainty and flexibility while helping to avoid the side effects of the approaches discussed in the Notice of Proposed Rulemaking.

NAB appreciates the thoughtful discussion of these proposals set forth in the NPRM. We hope the Commission will seek to provide broadcasters with as much flexibility as possible in implementing simulcasting arrangements, and we look forward to discussing the features and drawbacks of these proposals, as well as developing potential alternatives, in the record of this proceeding.

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[1] *Authorizing Permissive Use of the "Next Generation" Broadcast Television Standard*, Notice of Proposed Rulemaking, GN Docket No. 16-142, FCC 17-13, ¶¶ 15-22 (Feb. 24, 2017).

Respectfully Submitted,

Patrick McFadden
Associate General Counsel,
National Association of Broadcasters

cc: Meeting Attendees