

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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<i>In the Matter of</i>	)	
	)	
International Bureau seeks Comment	)	IB Docket No. 16-185
on Recommendations Approved by	)	Document WAC/058 (23.04.18)
World Radiocommunication Conference	)	
Advisory Committee	)	
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**JOINT COMMENTS OF CBS CORPORATION, NBCUNIVERSAL MEDIA, LLC, THE  
WALT DISNEY COMPANY, 21ST CENTURY FOX, INC., ABC TELEVISION  
AFFILIATES ASSOCIATION, CBS TELEVISION NETWORK AFFILIATES  
ASSOCIATION, FBC TELEVISION AFFILIATES ASSOCIATION AND NBC  
TELEVISION AFFILIATES**

CBS Corporation, NBCUniversal Media, LLC, the Walt Disney Company, 21st Century Fox, Inc., ABC Television Affiliates Association, CBS Television Network Affiliates Association, FBC Television Affiliates Association, and NBC Television Affiliates (collectively, “Joint Broadcast Commenters”) hereby comment on the draft Recommendation approved by the Federal Communications Commission’s (“FCC” or “Commission”) World Radiocommunication Conference Advisory Committee (“WAC”). The Joint Broadcast Commenters join broadcasting companies and organizations in support of IWG-2 View A on WRC-19 Agenda item 8, which recommends the deletion of the United States in Footnote Nos. 5.295 and 5.297 of the International Telecommunication Union (“ITU”) Radio Regulations.<sup>1</sup>

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<sup>1</sup> CBS Corporation, The National Association of Broadcasters (NAB) and 21<sup>st</sup> Century Fox all supported View A during the IWG-2 process. CBS Corporation was deleted from Document WAC/058 (23.04.18) subsequent to approval of the Document by the WAC (*see* FCC posting at [https://ecfsapi.fcc.gov/file/10417696810910/WAC\\_058\\_IWG-4\\_AI%208%20View%20A\\_B.DOCX](https://ecfsapi.fcc.gov/file/10417696810910/WAC_058_IWG-4_AI%208%20View%20A_B.DOCX)).

View A simplifies the Radio Regulations to reflect the current determination of frequency allocations in the 512-608 MHz band within the United States, as determined by the Commission. This change is a natural next step following the Commission's modification of the domestic Table of Frequency Allocations to reflect the outcome of the incentive auction, pursuant to which the 512-608 MHz band is *not* allocated for mobile use.<sup>2</sup> View B, on the other hand, attempts to maintain out-of-date information relative to the United States as presented to the international community through the Radio Regulations. For these reasons, the Joint Broadcast Commenters urge the Commission to adopt View A of the WAC's Recommendation on Agenda item 8 as the U.S. government prepares to develop positions for WRC-19.

Respectfully submitted,

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<sup>2</sup> See *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, GN Docket No. 12-268, Order, 32 FCC Rcd 6916 (2017).

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