June 22, 2018

**Filed Electronically**

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

**Re: *Written Ex Parte Presentation*GN Docket Nos. 17-183 & 18-122**

Dear Madam Secretary:

Learfield Communications, LLC (“Learfield”), which delivers NCAA sports broadcasts, statewide news and farm programming, strongly urges the Commission to ensure continued availability of high quality C-band satellite services as part of any changes it considers to the use of the 3.7-4.2 GHz frequency band. Learfield further requests that the Commission modify its C-band receive-only earth station registration procedures by eliminating or reducing the filing fee and establishing a streamlined mechanism that allows multiple receive antenna sites to be included in a single filing.

As a number of satellite industry members have emphasized in their filings in this proceeding, C-band satellites play an indispensable role in the nation’s communications infrastructure, including serving as the backbone for distribution of video and audio programming enjoyed by U.S. consumers in their homes, cars, and workplaces around the country.

Learfield, for example, distributes NCAA collegiate sports broadcasts, statewide news networks, and farm network programming to approximately 800 C-band receive-only earth stations across the entire United States. Continued access to adequate C-band satellite spectrum and protection from interference is critical to Learfield and our affiliated radio stations to allow continued high- quality delivery of sports, news and farm programming as there is no alternative transmission mechanism that matches the reliability and reach of C-band satellites. Without such spectrum and protections, the adverse impact to Learfield and its radio affiliates would be significant. Furthermore, U.S. consumers would be deprived of critical statewide political news reports, agricultural prices and practice policies reports, and or the local college/university sports teams coverage of NCAA athletics. Learfield’s affiliated radio stations include such radio affiliates as KGO in San Francisco, CA, WGN/WSCR in Chicago, IL, KMOX in St. Louis, MO, KHKS in Dallas, TX, KFAN in Minneapolis, MN and KQV in Pittsburgh, PA.

Consistent with the Commission’s rules, the vast majority of the C-band receive-only earth stations are unregistered. For example, only about 8% of the sites that receive content programming from Learfield are currently registered with the Commission. As a result, the Commission does not have accurate information regarding the total number or specific locations of the thousands or even tens of thousands of C-band receive-only earth stations in use today.

Under the existing regulatory framework, registration of receive-only earth stations is cost-prohibitive for many providers. While the Commission has waived the coordination report requirement, the rules still require payment of a $435 per site application fee to the Commission. These costs quickly add up for operators with significant numbers of receive-only earth stations in service, and it can be an obstacle to registration for smaller entities with very limited operating budgets.

Compiling and submitting all of the data required by the registration process is also unduly burdensome, representing a significant strain on the limited resources of many smaller market stations or companies affiliated with Learfield programming. Streamlining the information requirements to allow submission of receive-only earth stations at multiple sites via a single registration filing would minimize these burdens and encourage more receive-only earth station operators to complete the registration process. Maximizing the number of registered earth stations will give the Commission the tools needed to protect C-band satellite operations, ensuring that U.S. consumers who currently receive and rely on Learfield for sports, news and farm programming will continue to do so for many years to come.

We respectfully submit that the Commission will not be able to make sound decisions regarding C-band spectrum if it does not have the facts regarding existing satellite operations in these frequencies. In order to obtain that essential information, we request that the Commission revise its registration procedures to allow receive-only earth station locations to be identified without the substantial costs – both financial and administrative – that are imposed under the current Commission registration rules. Further, to ensure uninterrupted reception of Learfield’s sports, news and farm market programming, we request that the Commission adopt policies that provide ongoing access to adequate C-band satellite spectrum and protection from interference.

Thank you for your consideration of this request.

Respectfully submitted,

Randy W. Williams

Chief Engineer- Manager Technical Operations