

July 20, 2018

**BY ELECTRONIC FILING**

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

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

Dear Ms. Dortch:

On July 18, 2018, Paula Boyd and Michael Daum of Microsoft Corporation and Paul Margie and the undersigned of Harris, Wiltshire & Grannis, LLP met with Brooke Ericson, Chief of Staff and Media Advisor to Commissioner O’Rielly and law clerk Emily Caditz, and separately with Kate Black, Policy Advisor to Commissioner Rosenworcel. On July 19, we met separately with Alison Nemeth, Media Advisor to Chairman Pai and Evan Swarztrauber, Policy Advisor to Commissioner Carr.<sup>1</sup>

In these meetings, we discussed reimbursement of LPTV, TV translator, and FM broadcast stations for costs incurred as a result of the Commission’s broadcast television spectrum incentive auction. Due to the auction and the post-auction repack, displaced broadcasters across the country will require new filters to transition to the channels they selected during the Special Displacement Window. However, some types of filters will advance the Commission’s spectrum policy by promoting greater overall band utilization. Accordingly, we asked that the Commission, in its upcoming Notice of Proposed Rulemaking, include questions on allowing broadcasters to seek reimbursement for equipment, such as transmit filters, needed to allow them to meet the full-service mask defined in 47 C.F.R. § 74.794(a)(2)(iii). We recommended that the NPRM ask whether the Commission could promote greater use of the television band by reimbursing full-service filters for all low-power broadcasters, rather than stringent or simple masks. We also recommended that the NPRM should ask whether such equipment should be considered a reasonably incurred relocation cost that is eligible for reimbursement, because it would increase the overall value of the broadcast band regardless of whether the broadcaster used such equipment in its pre-auction facility. Finally, we

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<sup>1</sup> Michael Daum and Paul Margie participated in each of these meetings telephonically.

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recommended that the NPRM ask about the marginal cost of complying with the full-service mask, as opposed to the stringent or simple masks, the prevalence of broadcast transmitters using these less efficient masks today, and the extent to which broadcasters have relied upon the use of a full-service mask to find a usable displacement channel, even if the broadcaster previously used a less efficient mask.

Pursuant to the FCC's rules, I have filed a copy of this notice electronically in the above-referenced dockets. If you require any additional information, please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads "Paul Caritj". The signature is fluid and cursive, with the first name "Paul" and last name "Caritj" clearly distinguishable.

Paul Caritj

*Counsel for Microsoft Corporation*

Encl.

cc: meeting participants