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July 21, 2017

VIA ELECTRONIC COMMENT FILING SYSTEM

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20054

Re: *In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2017*
MD Docket No. 17-134
Notice of Ex Parte Communication

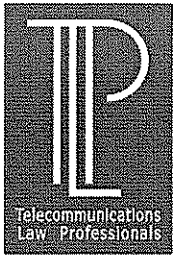
Dear Ms. Dortch:

On July 20, 2017, Brad Moran, President/owner of Ramar Communications, Inc. ("Ramar") and undersigned Ramar counsel met separately with: (i) Alison Nemeth, Media Advisor to Chairman Ajit Pai, and (ii) Commissioner Michael O'Rielly and his Legal Advisor Erin McGrath. In both meetings, Ramar discussed issues raised by Ramar in its June 22, 2017 Comments in MD Docket No. 17-134 relating to the "satellite" status of certain Ramar television stations in the Albuquerque-Santa Fe DMA ("ASFD") for purposes of annual regulatory fees.

Ramar asked that the Commission afford it equitable regulatory fee treatment vis-à-vis all other satellite television stations – i.e., those which need waivers pursuant to Note 5 of 47 C.F.R. § 73.3555 due to predicted signal contour overlap between parent and satellite, and those with no such overlap and no need for Note 5 waivers. Ramar pointed out that all satellite stations are "second class citizens" in the competitive marketplace, and that the Commission has historically assessed lower regulatory fees on all stations listed as satellites in standard industry publications, whether or not the station needed a Note 5 waiver. With respect to the ASFD, where Note 5 waivers are typically not needed by satellites because of that DMA's vast geographic area, Ramar supplied illustrative maps, copies of which are attached hereto, showing the starkly inferior nature of the ASFD over-the-air coverage of satellite stations versus those stations' parents. For example, KUPT covers only 3.26 percent of the ASFD's population and 2.15 percent of its area.

Ramar suggested that the Commission ensure equitable regulatory fee treatment of all satellite stations by clarifying that the Commission will be guided by satellite status as shown in standard industry sources like BIA Kelsey or the Television and Cable Factbook (an approach which has the benefit of

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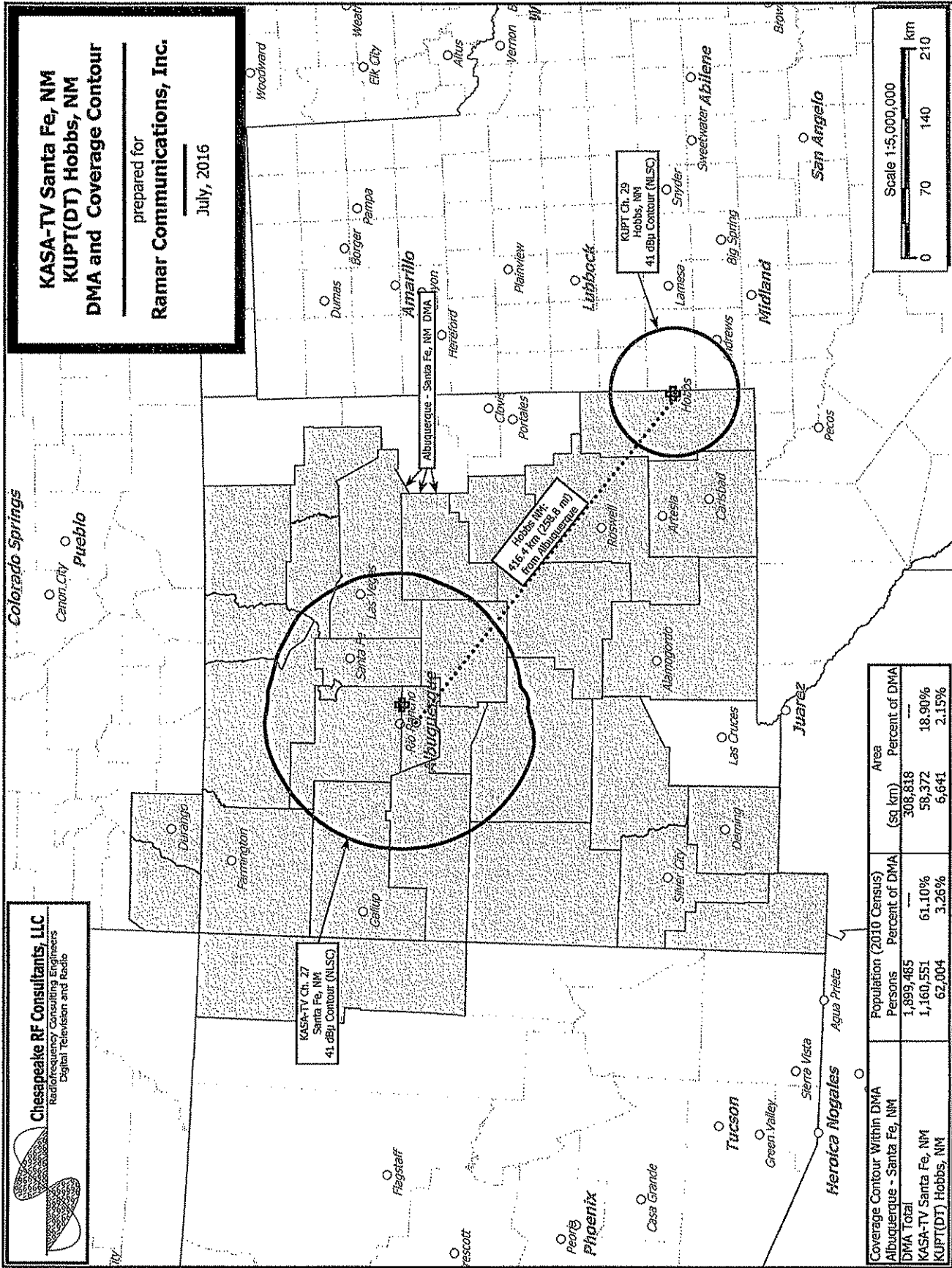
being market-based – advertising and programming markets disfavor stations that hold themselves out as satellites). In the alternative, Ramar urged the Commission to make clear that non-Note 5 waiver stations will be given the opportunity to make showings to the Commission that they are satellites, not “standalone” stations.

Sincerely,

/s/ Dennis P. Corbett

Dennis P. Corbett
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc (via email): Hon. Michael O’Rielly
Alison Nemeth
Erin McGrath



Chesapeake RF Consultants, LLC
 Radiofrequency Consulting Engineers
 Digital Television and Radio

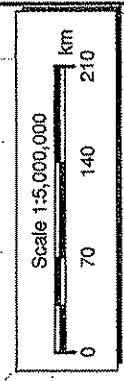
Colorado Springs
 Canon City
 Pueblo

**KASA-TV Santa Fe, NM
 KUPT(DT) Hobbs, NM
 DMA and Coverage Contour**

prepared for
Ramar Communications, Inc.

July, 2016

Coverage Contour Within DMA	Population (2010 Census)	Area	Percent of DMA	Percent of DMA
Albuquerque - Santa Fe, NM	Persons	(sq km)		
DMA Total	1,899,485	308,818	---	---
KASA-TV Santa Fe, NM	1,160,551	58,372	61.10%	18.90%
KUPT(DT) Hobbs, NM	62,004	6,641	3.26%	2.15%



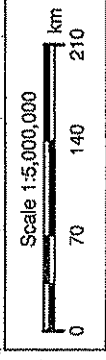
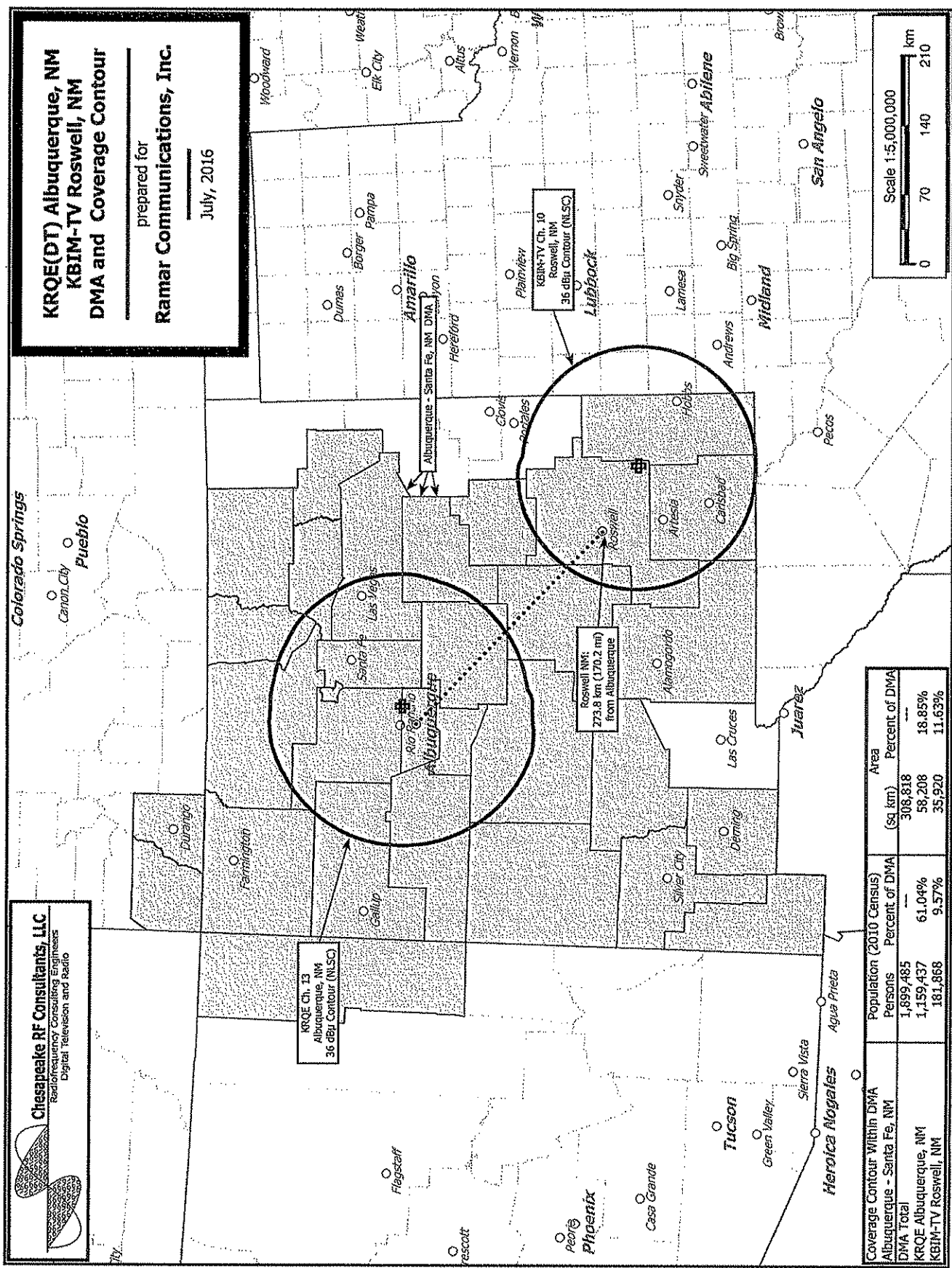


Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio

Colorado Springs

**KRQE(DT) Albuquerque, NM
KBIM-TV Roswell, NM
DMA and Coverage Contour**

prepared for
Ramar Communications, Inc.
July, 2016



Coverage Contour Within DMA		Population (2010 Census)		Area	
Albuquerque - Santa Fe, NM	DMA	Persons	Percent of DMA	(sq km)	Percent of DMA
DMA Total		1,899,485	---	308,818	---
KRQE Albuquerque, NM		1,159,437	61.04%	58,208	18.85%
KBIM-TV Roswell, NM		181,868	9.57%	35,920	11.63%

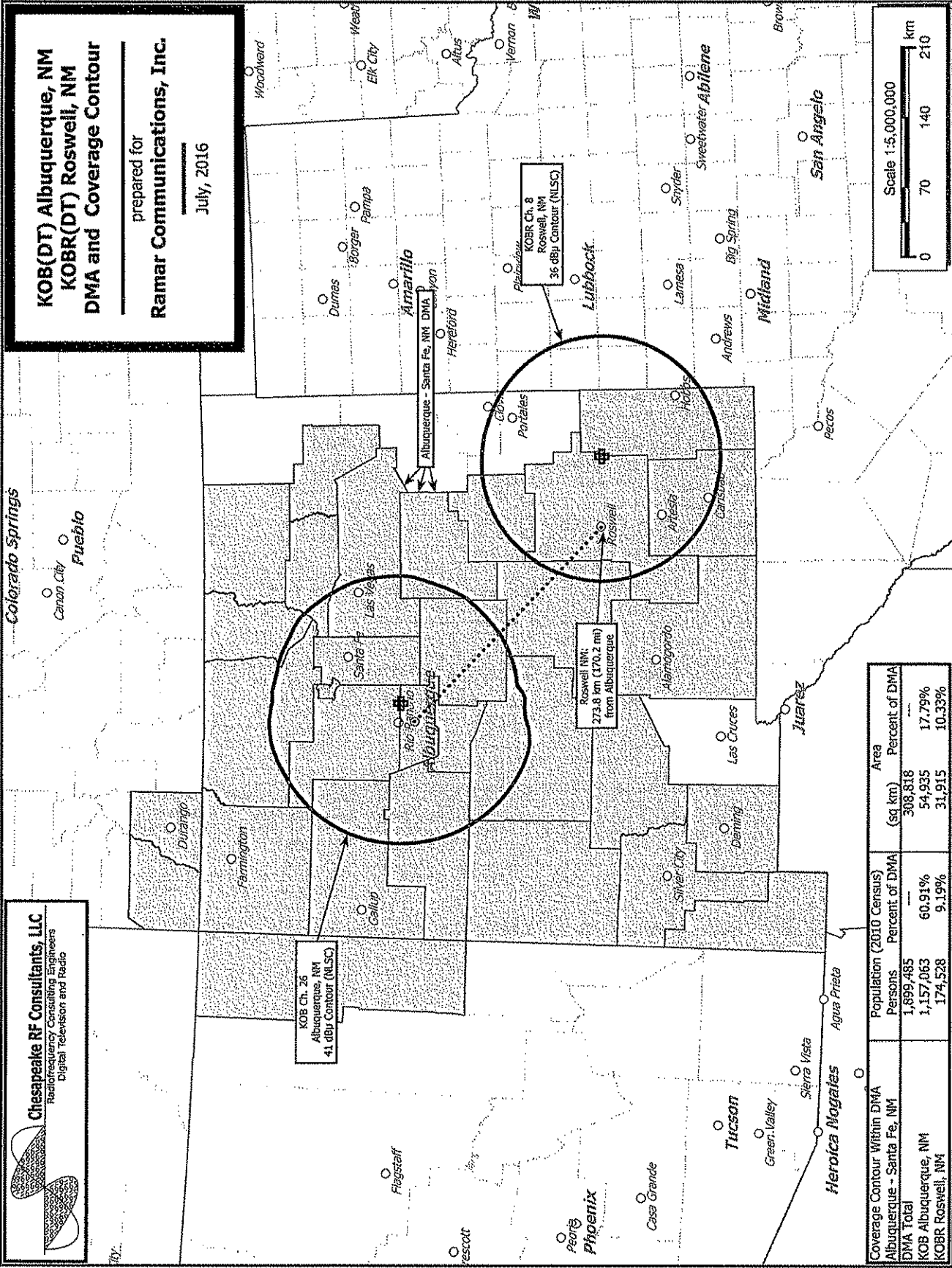


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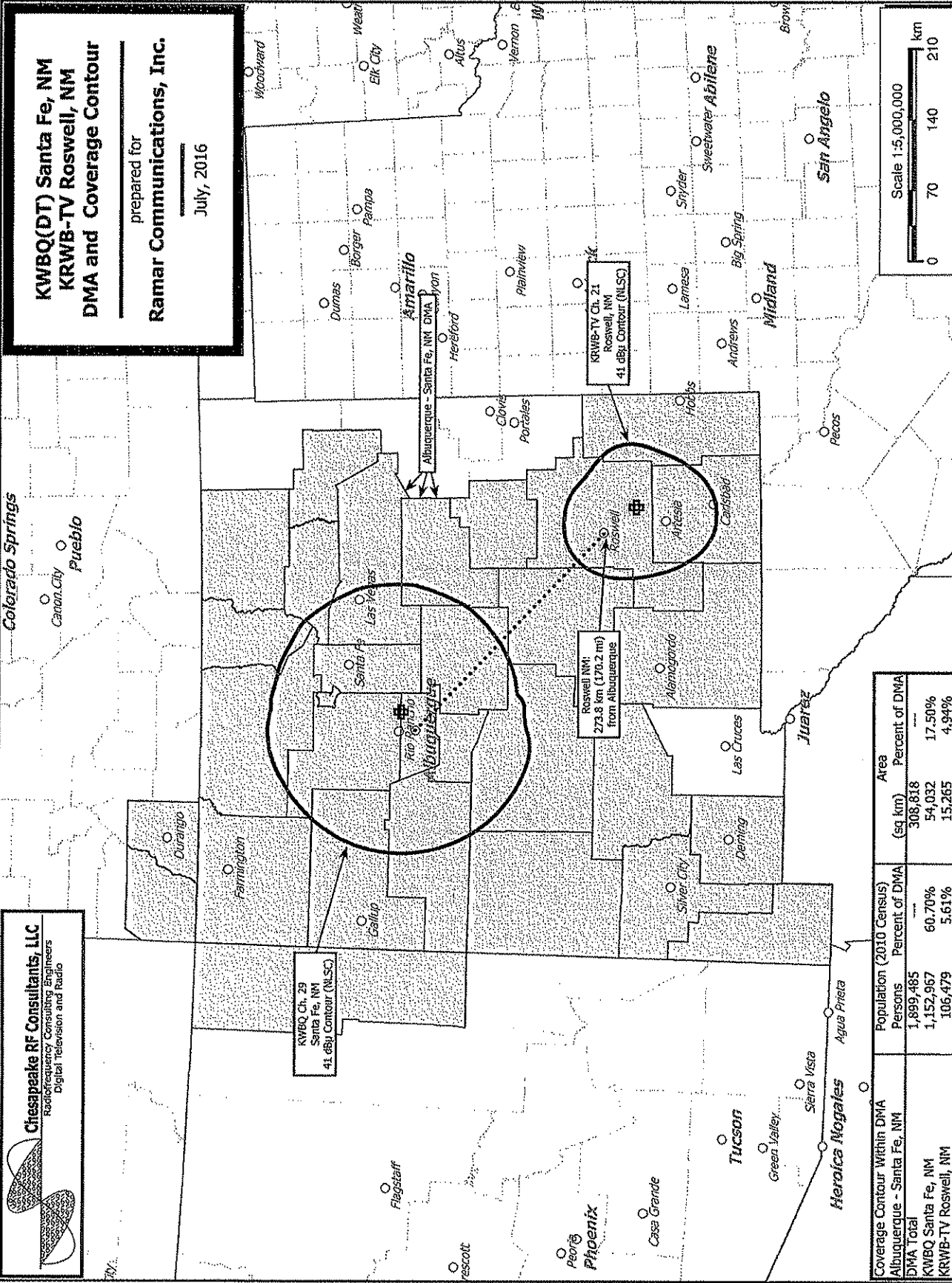
**KOB(DT) Albuquerque, NM
KOB(RDT) Roswell, NM
DMA and Coverage Contour**

prepared for
Ramar Communications, Inc.

July, 2016



Coverage Contour Within DMA		Population (2010 Census)		Area	
Albuquerque - Santa Fe, NM	DMA Total	Persons	Percent of DMA	(sq km)	Percent of DMA
1,899,485	1,157,063	60.91%	9.19%	308,818	---
KOB Albuquerque, NM	174,528	15.19%	10.33%	54,935	17.79%
KOB Roswell, NM	---	---	---	31,915	10.33%



Coverage Contour Within DMA		Population (2010 Census)		Area	
DMA Total	Albuquerque - Santa Fe, NM	Persons	Percent of DMA	(sq km)	Percent of DMA
1,899,485	1,152,967	1,899,485	60.70%	308,818	17.50%
KWBQ Santa Fe, NM	KRWB-TV Roswell, NM	106,479	5.61%	15,265	4.94%