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August 22, 2017

**VIA ELECTRONIC COMMENT FILING SYSTEM**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 August 22, 2017, undersigned counsel to Ramar Communications, Inc. (“Ramar”) held a telephone conversation with Holly Saurer, Acting Legal Advisor to Commissioner Jessica Rosenworcel. In the conversation, I addressed 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 proposed that in this year’s regulatory fee order the Commission grant regulatory fee relief to any TV station not listed in Appendix E to the NPRM, FCC 17-62, which makes a two-pronged showing: (i) through a current listing in the Television and Cable Factbook or BIA, that it is



recognized within the industry as a satellite; and (ii) through an industry broker's letter consistent with Commission Note 5 waiver precedent, that it is not a standalone station.

Ramar asks the satellite fee be applied to stations that make both showings. In the alternative, drawing on the discussion in ¶ 22 of the NPRM, Ramar suggests that relief take the form of a fee that is 50 percent of the \$5,000 Remaining Markets fee, or \$2,500 (which is more than the Appendix E station fee).

The predicate underlying Ramar's proposal is that such industry-recognized, non-standalone satellite stations need and deserve relief from high full-market fees that imperil their future. Such high fees dwarf those of competing satellite stations which, due to the happenstance of signal contour overlap, need Note 5 waivers.

The two prongs will ensure that the universe of stations entitled to this relief is small and self-contained (industry-recognized *satellites* only) and deserving (like Note 5 waiver satellites, these satellites are not standalone stations).

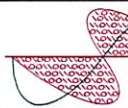
Sincerely,

/s/ Dennis P. Corbett

Dennis P. Corbett  
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc (via email): Holly Saurer

**ATTACHMENT**



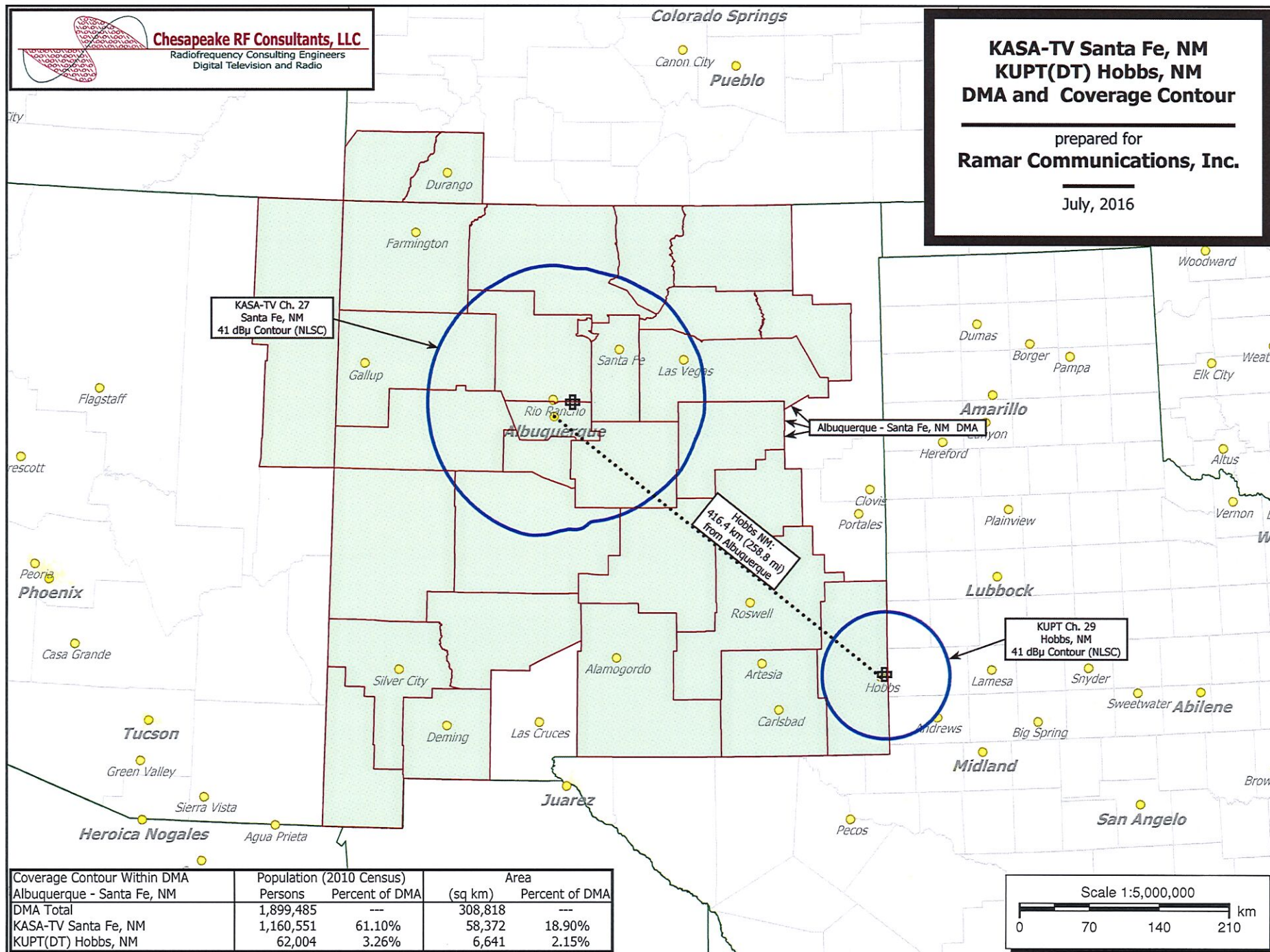
# Chesapeake RF Consultants, LLC

Radiofrequency Consulting Engineers  
Digital Television and Radio

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

prepared for  
**Ramar Communications, Inc.**

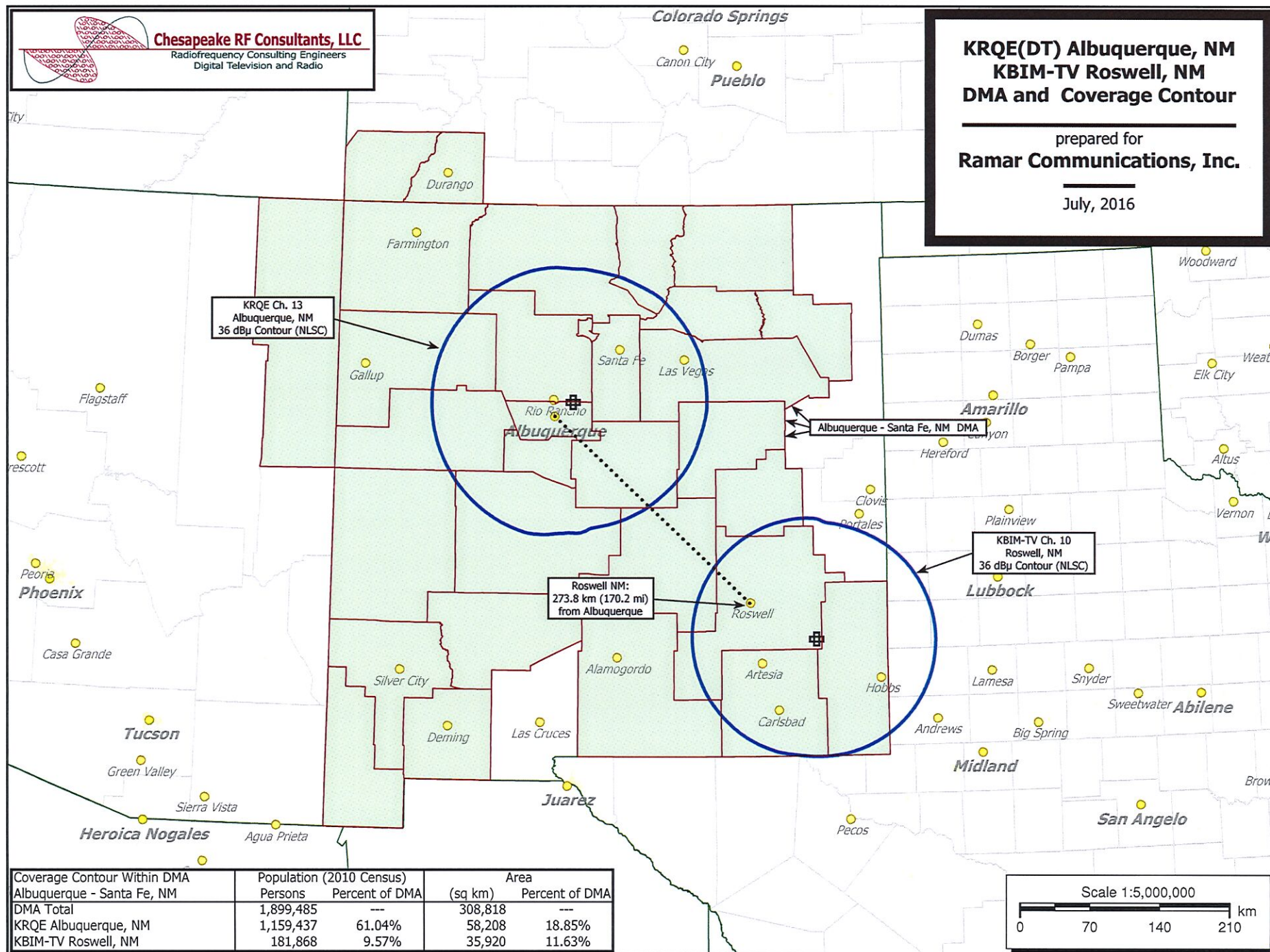
July, 2016



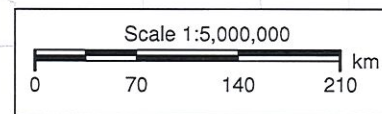
**KRQE(DT) Albuquerque, NM  
KBIM-TV Roswell, NM  
DMA and Coverage Contour**

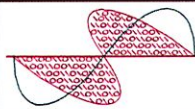
prepared for  
**Ramar Communications, Inc.**

July, 2016



Coverage Contour Within DMA	Population (2010 Census)		Area	
Albuquerque - Santa Fe, NM	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%



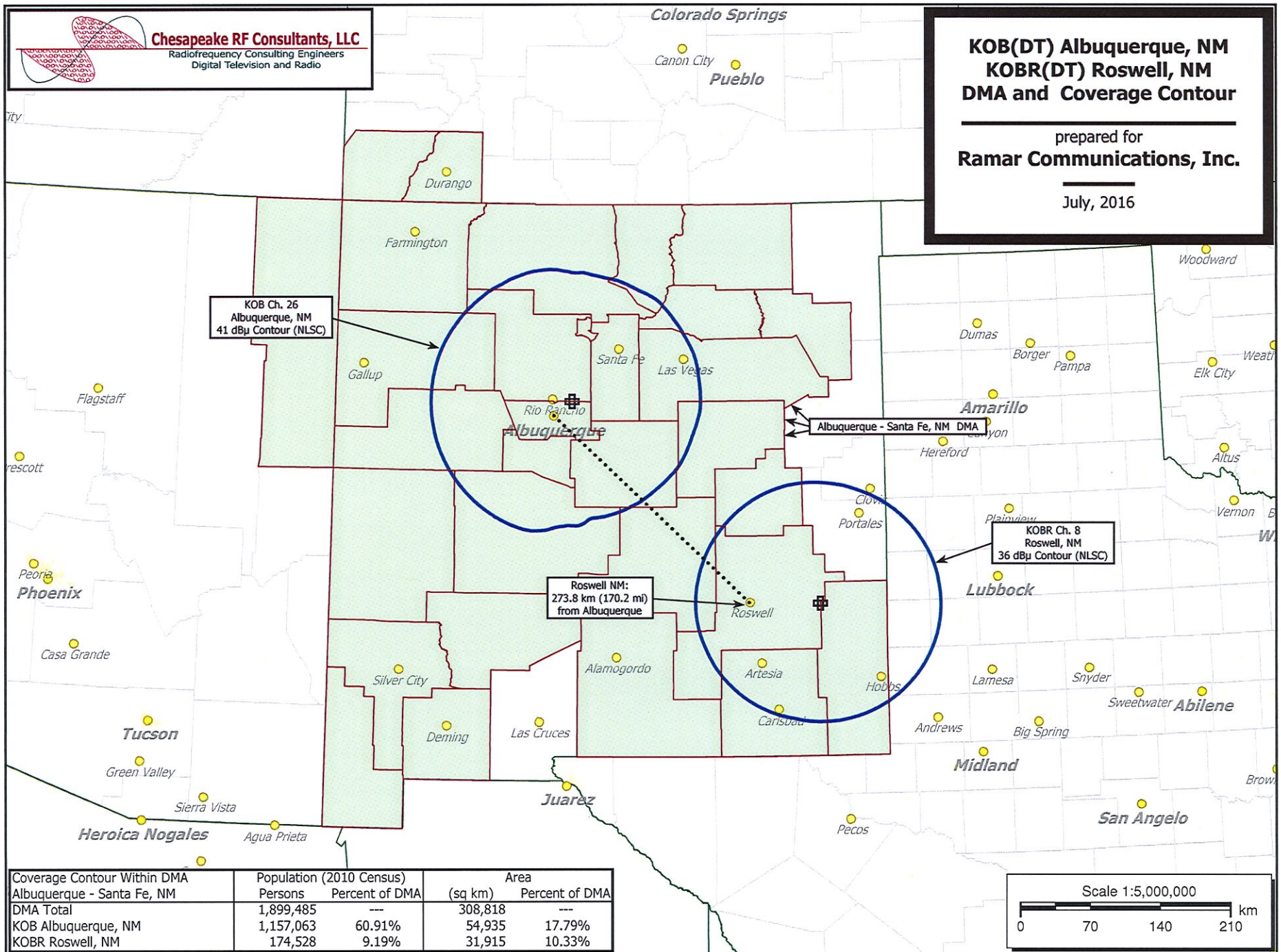


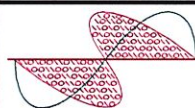
**Chesapeake RF Consultants, LLC**  
Radiofrequency Consulting Engineers  
Digital Television and Radio

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

prepared for  
**Ramar Communications, Inc.**

July, 2016



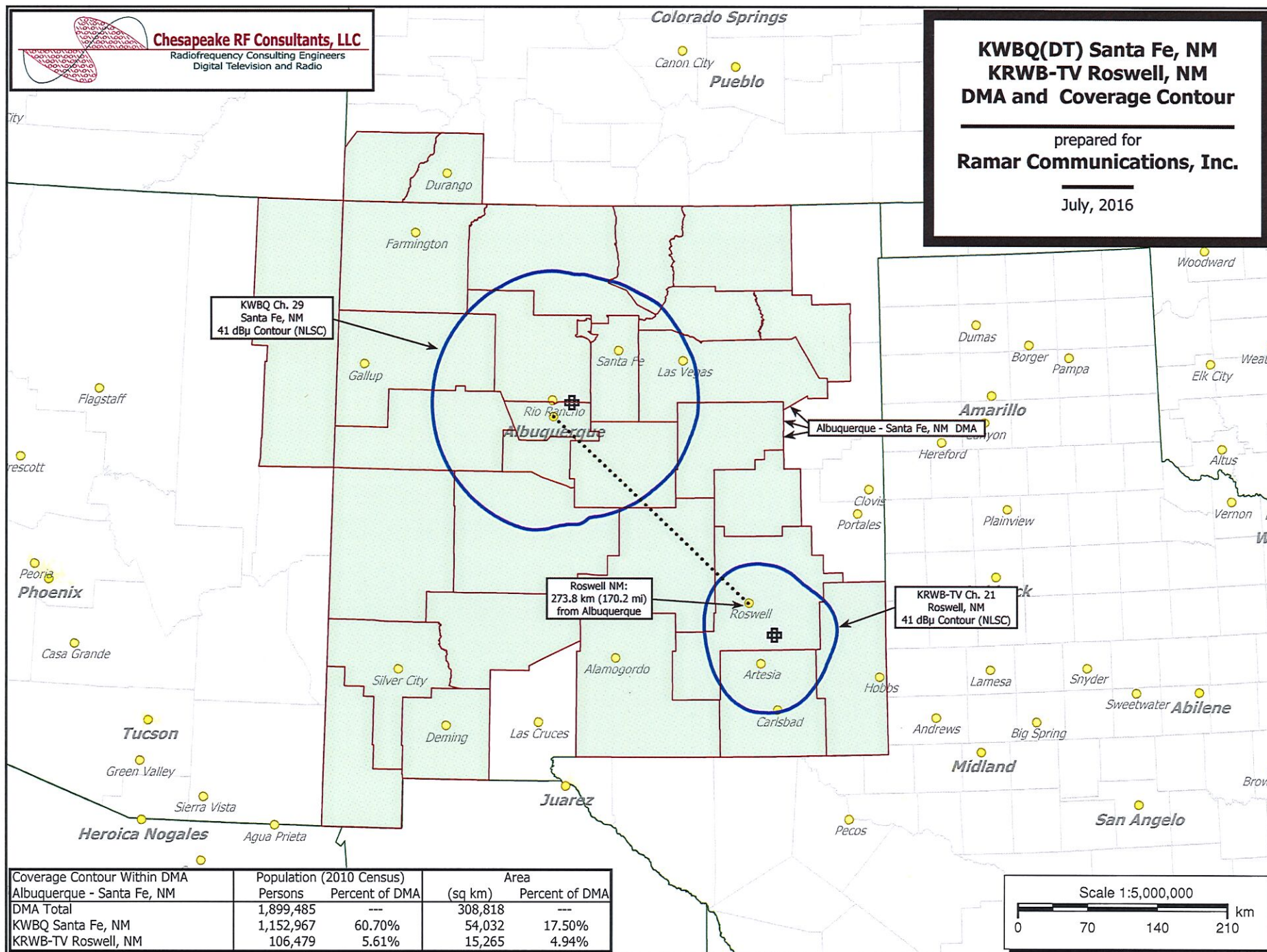


**Chesapeake RF Consultants, LLC**  
Radiofrequency Consulting Engineers  
Digital Television and Radio

**KWBQ(DT) Santa Fe, NM  
KRWB-TV Roswell, NM  
DMA and Coverage Contour**

prepared for  
**Ramar Communications, Inc.**

July, 2016



Coverage Contour Within DMA	Population (2010 Census)		Area	
	Persons	Percent of DMA	(sq km)	Percent of DMA
DMA Total	1,899,485	---	308,818	---
KWBQ Santa Fe, NM	1,152,967	60.70%	54,032	17.50%
KRWB-TV Roswell, NM	106,479	5.61%	15,265	4.94%