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Via ECFS

November 6, 2017

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW, Room TW-A325  
Washington, DC 20554

Re: MB Docket Nos. 17-105, 14-50, 09-182, 07-294, 04-256

Dear Ladies and Gentlemen:

On behalf of Gray Television, Inc., this notice is submitted of an ex parte presentation made to Alison Nemeth, Media Advisor, Office of Chairman Pai on October 6, 2017 by Robert McDowell and the undersigned of Cooley, LLP.

In filings of June 26, 2017 and June 28, 2017 and presentations on June 26, 2017 and October 10, 2017, Gray has urged the FCC to update its processing and grant of television satellite stations in order to avoid unnecessary time and expense for both the applicants and the Commission. Gray has pointed out that the current processing system adopted over 27 years ago serves no useful purpose and Gray has proposed new procedures that would be appropriate for the Commission to adopt and that are long overdue.

Gray has noted that the 1991 procedures employed a presumptive grant approach based upon a three part showing. However, with the transition from analog to digital broadcasting the Commission's three part showing has been unavailable to all applicants, as there is no longer a City Grade contour for television stations. Accordingly, the Commission has continued to process and grant satellite station requests and reauthorizations using an ad hoc approach in each case.

Gray believes that this is further evidence of the need for the Commission to move expeditiously to remedy an old, and now broken process. The answer is quite simple for reauthorizations of existing television satellite stations – namely, if at the time of the filing of the assignment or transfer application involving a television satellite station, that station has been operating as a satellite for the previous 8 years (and the applicants upload as part of their FCC application a copy of the most recent FCC decision granting satellite status) then the ad hoc test for review will be deemed satisfied and the Commission will reauthorize the satellite television station.

Very truly yours,

/s/ John R. Feore  
John R. Feore  
Counsel to ION Media Networks

Enclosure

cc: Alison Nemeth  
Robert M. McDowell