

November 21, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-B204
Washington, DC 20554

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

LPTV, TV Translator, and FM Broadcast Station
Reimbursement

MB Docket No. 18-214

GN Docket No. 12-268

Expanding the Economic and Innovation
Opportunities of Spectrum Through Incentive
Auctions

Adopted: August 2, 2018

Released: August 3, 2018

COMMENTS OF EDGE SPECTRUM, INC.

Edge Spectrum, Inc. is grateful for the opportunity to comment on the hard work of the Commission staff to develop fair and equitable reimbursement policies and procedures for the displacement expenses and challenges that our part of the broadcast industry face.

Our comments are modest in scope and substance as the “Appendix A, September 2018, Catalog of Potential Expenses and Estimated Costs for Low Power Television (LPTV) Stations, FM Stations and FM and TV Translators” has been thoughtfully and comprehensively developed to address most of the equipment, services and general expenses that have been created by the Voluntary Incentive Auction repack and displacement process. There are, however, a few inconsistencies that are of

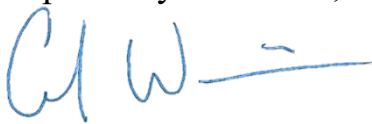
significant expense exposure to LPTV licensees about which we seek clarification in this comment period.

There are some inconsistencies in the Catalog between the LPTV expense reimbursement list in Section II and the FM radio station list in Section III. In Section II there is no mention of the potential requirement for HVAC equipment or the potential use of helicopter installation services. In Section III of the FM authorized expense reimbursement list there is a line item that reads: "Helicopter installation/removal (for antennas on top of high-rise buildings, a complex tower, or tower that is terrain-constrained so that antennas can't be lifted using a gin pole or winches)." This item should also be added to the LPTV section, as Edge Spectrum, Inc. has known licensed station locations where helicopter services will be the ONLY alternative for our displacement construction. Our license (W28DQ-D) in Windsor, Vermont is located in a National Forest with no road access, in addition we face numerous winter time installations in heavy snow environments that will be required to meet the FCC timeline for displacement construction deadlines.

Similarly, there is no reference in the LPTV Section II for reimbursement of any required HVAC installations, and there will certainly be numerous examples where either increasing or adding HVAC cooling to the enclosures housing the LPTV transmitters will be essential requirements caused by the displacement process.

Clarifying what appears to be a simple oversight in the development of the Catalog will be widely appreciated by LPTV licensees, and we thank the Commission in advance for its consideration of our comments.

Respectfully submitted,



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