

November 22, 2019

Filed Electronically Via ECFS

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

Re: *Ex Parte* Filing in GN Docket No. 18-122

Dear Ms. Dortch:

The ABC Television Affiliates Association, CBS Television Network Affiliates Association, FBC Television Affiliates Association, and NBC Television Affiliates (collectively, the “Affiliates Associations”)¹ submit this letter in support of the position taken by Chairman Pai that any forthcoming Order regarding the C-band spectrum “must protect the services that are currently delivered using the C-band so they can continue to be delivered to the American people[,]” by, among other things, preserving “the availability of the upper 200 megahertz of this band for the continued delivery of programming.”²

Chairman Pai’s statement is in accord with the Affiliates Associations’ views expressed in previous filings urging that any plan the Commission adopts to reallocate some portion of and expand operations in the C-band must ensure (1) continued, smooth, reliable delivery of satellite video in the band, and (2) full protection for the broadcasters, content creators, MVPDs, and the hundreds of millions of consumers who rely on access to the content those incumbents create and distribute in the C-band.³

The Affiliates Associations also echo completely the comments made in the recent joint letter submitted by the National Association of Broadcasters and several large media companies, which letter rightly recognizes the enormity and complexity of the Commission’s task of clearing 300 megahertz of spectrum from a 500 megahertz-wide band while protecting robust content distribution in the remaining 200 megahertz (free of harmful interference and without new terrestrial transmissions) during and after

¹ Each of the ABC Television Affiliates Association, CBS Television Network Affiliates Association, FBC Television Affiliates Association, and NBC Television Affiliates is a non-profit trade association whose members consist of local television broadcast stations throughout the country that are each affiliated with its respective broadcast television network. Collectively, the Affiliates Associations represent more than 500 local television stations that are affiliated with the major broadcast networks. The Affiliates Associations’ member stations provide news, weather, sports, entertainment, and other valuable, highly-desired video content to virtually every community in the country.

² See, e.g., Letter from Chairman Ajit Pai to the Hon. John N. Kennedy (Nov. 18, 2019), available at <https://docs.fcc.gov/public/attachments/DOC-360855A14.pdf>.

³ See generally ABC Television Affiliates Association, CBS Television Network Affiliates Association, FBC Television Affiliates Association, and NBC Television Affiliates, Joint Reply Comments, GN Dkt. No. 18-122 (Aug. 14, 2019).

the reallocation.⁴

The Affiliates Associations look forward to continuing to work with the Commission and other stakeholders to ensure that the satellite video delivery services on which hundreds of millions of consumers depend are neither degraded nor interrupted, and that existing C-band video delivery conduits are fully protected, during the transition of the C-band.

Respectfully submitted,

**CBS TELEVISION NETWORK
AFFILIATES ASSOCIATION**

**FBC TELEVISION AFFILIATES
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⁴ See Ex Parte Submission from National Association of Broadcasters, The Walt Disney Company, CBS Corporation, NBCUniversal, Viacom Inc., A&E Television Networks, LLC, Univision Communications Inc., Fox Corporation, and Discovery, Inc., to Marlene H. Dortch, Secretary, FCC, GN Dkt. No. 18-122 (Nov. 19, 2019).