



November 30, 2018

*Via Electronic Filing*

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

Re: MB Docket No. 18-214; GN Docket No. 12-268; MB Docket 16-306 *Ex Parte* Notice

Dear Ms. Dortch:

Pursuant to Section 1.1200, et seq., of the Commission's Rules, National Public Radio, Inc. ("NPR") hereby notifies the Commission of the following *ex parte* presentation in the above-referenced proceedings. On Wednesday, November 28, 2018, Mike Riksen, Vice President, Policy & Representation, Joni Lupovitz, Senior Director for Public Policy, and the undersigned met with the following Commission personnel: James Bradshaw, Senior Deputy Chief, Audio Division, Thomas Nessinger, Senior Counsel, Audio Division; Jean Kiddoo, Hillary DeNigro, and Charles Eberle of the Incentive Auction Task Force; Pamela Gallant, Media Bureau; and Maria Mullarkey, Media Bureau (by telephone).

During the meeting, NPR cited the significant disruption to public radio stations caused by the television spectrum "repack" and encouraged the Commission to maximize reimbursement so that "bystander" public radio stations can minimize service disruptions. NPR noted that delays in completing TV station repack work could cause additional and multiple disruptions to bystander radio stations. Consistent with its Comments in this proceeding, NPR reiterated its opposition to a graduated reimbursement proposal based on time off-air as impractical and unnecessary; urged the Commission to use the FY 2019 funds appropriated for the Repack Reimbursement Fund to supplement the FY 2018 funding designated for FM stations if additional funds are needed to make public radio stations whole; encouraged the Commission to provide reimbursement for project management costs so that affected, but under-resourced, radio stations are able to obtain the expert help they need participate in the FCC cost reimbursement process; and prioritize reimbursement for non-profit public radio stations. The meeting participants discussed outreach efforts to ensure stations are aware of and prepared for service disruptions and steps a station might take to minimize disruption, including obtaining an auxiliary antenna authorization in anticipation of disruption.

Please direct any questions you may have to the undersigned at 202.513.2050.

Sincerely,

*Gregory A. Lewis /s/*

Gregory A. Lewis  
Deputy General Counsel

Cc: Mr. Bradshaw  
Mr. Nessinger  
Ms. Kiddoo  
Ms. DeNigro  
Mr. Eberle  
Ms. Gallant  
Ms. Mullarkey