



LPTV
SPECTRUM
RIGHTS
COALITION

MIKE GRAVINO
DIRECTOR

PO BOX 15141
600 PENNSYLVANIA AVE, SE
WASHINGTON, DC 20003

WWW.LPTVCOALITION.COM
LPTVCOALITION@GMAIL.COM
(202) 604-0747

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Via ECFS

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

Re: Ex Parte Email Regarding GN Docket No. 12-268: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions

Dear Ms. Dortch:

The LPTV Spectrum Rights Coalition, (the “LPTV Coalition”), represents a diverse group of over 160 FCC LPTV licensees with more than 1000 built stations and new construction permits in all 50 states, DC, and Puerto. We also have as members numerous programming networks and professional service providers to the LPTV industry. Our members provide 100s of diverse, local, and national channels reaching more than 75+ million viewers.

On October 7th, 2014 the LPTV Coalition had an ex parte email communications related to the following members of the Auction Task Force: Gary Epstein, Chairman; Howard Symons, Vice-Chairman; William Lake, Media Bureau Chief; and Barbara Kreisman, Video Division. This was the text of the email:

“Now that the Greenhill Report has been issued and Class-A licensees are being contacted, our Coalition is starting to field queries from them about when they need to complete their conversions to digital. As you can appreciate there is a lot of activities to do for this, especially as winter is approaching, and there be so many of them yet to convert.

- 1) Tower work slows down a lot because of winter
- 2) Equipment shipments slow down because of both holiday and winter
- 3) End of year and next business planning needs to be done
- 4) Financing is still tight with so many unknowns still present in the auction process

The Media Bureau announced the Pre-Auction Licensing Deadline framework when it released the auction timeline back in June.

Authorized construction of new full power station facilities, channel substitutions for licensed full power stations, **modifications to existing** full power and **Class A facilities granted before the April 2013 freeze, and Class A digital conversion facilities must be completed and licensed by this deadline in order to be protected in the repacking process. Broadcasters will be notified 90 days before actual deadline.**

Our request for a clarification is simple. If a 90-day notification is being planned, but the Public Notice authorizing the final auction process could also happen in Q1, can we assume that we will have the entire first half of 2015 to complete the conversions? End of March Auction Procedures PN, 90-days forward brings it to the end of June. This would help a lot especially for the tower crews and equipment supply chains.

I know at this point you cannot be more specific as to actual dates, but in general would you say I am correct in that the PN is not anticipated before the end of March? These extra three months can help to make this process succeed vs. fail.”

Respectfully submitted,

Mike Gravino
Director
LPTV Spectrum Rights Coalition
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