

National Association for the Education of Young Children

1313 L Street NW, Suite 500, Washington, DC 20005-4101

202-232-8777 800-424-2460

Fax 202-328-1846

www.naeyc.org

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Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

To Whom It May Concern:

We are writing in support of the Petition for Reconsideration filed with the Federal Communications Commission (FCC) September 15, 2014 by the Association of Public Television Stations (APTS), the Corporation for Public Broadcasting (CPB), and the Public Broadcasting Service (PBS). The petition requests that the FCC revise its rules regarding the broadcast spectrum auction to ensure that after the auction and repacking of broadcast spectrum, no community in the country will be left without noncommercial educational television service.

The incentive auction rules as adopted by the FCC threaten six decades of FCC precedent reserving spectrum for noncommercial educational service – space effectively utilized by public broadcasting to deliver high quality educational programming for children and adults. The protection of these airwaves has been maintained into the digital age, as well. As recently as the digital television transition that was completed in 2009, the Commission has continued to reaffirm its commitment to reserving spectrum in every community for noncommercial public television service.

Public broadcasters believe the Commission can uphold its longstanding policy, while also conducting a successful incentive auction. The petition filed by APTS, CPB, and PBS put forward a balanced approach that allows any broadcaster to voluntarily relinquish spectrum, but maintains sufficient reserved spectrum to ensure continued educational service to all Americans. Public broadcast remains a valuable resource for educational opportunities for many Americans, especially those without access to commercial products. The educational content provided by public broadcasters is of great value to young children and the adults who work with them. NAEYC has long advocated access to educational services and content in its many forms. Programming provided by public broadcast, utilizing noncommercial spectrum, especially through such trusted sources as PBS and its partners is one of these vital educational resources. The petition submitted by public broadcast does not seek additional or expanded support from the FCC. It suggests an approach to conducting spectrum auction while preserving access to this nationally vital service. We strongly support the petition filed September 15, 2014.

Thank you for your consideration,



Rhian Evans Allvin
Executive Director