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March 5, 2015

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*Electronically Filed through ECFS*

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Washington, DC 20554

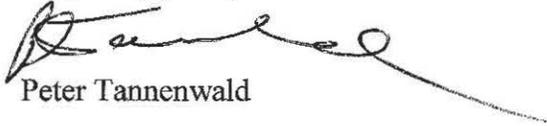
Re: Written *Ex Parte* Communication  
AU Docket No. 14-252  
GN Docket No. 12-268

Dear Ms. Dortch:

Submitted herewith is a written *ex parte* letter from WatchTV, Inc., to be placed in the docket files of the two above-captioned proceedings. This letter responds to an *ex parte* filing made on March 4, 2015, by the Expanding Opportunities for Broadcasters Coalition ("EOBC").

If there are any questions about this matter, please contact the undersigned.

Very truly yours,

  
Peter Tannenwald

Attachment

cc: (w/att) (by e-mail)  
Mr. Gregory J. Herman  
Preston Padden, Esq.

**WATCHTV, INC.**

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March 5, 2015

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Marlene H. Dortch, Secretary  
Federal Communications Commission  
Washington, DC 20554

Re: Written *Ex Parte* Communication  
AU Docket No. 14-252  
GN Docket No. 12-268

Dear Ms. Dortch:

On March 4, 2015, the Expanding Opportunities for Broadcasters Coalition (“EOBC”) submitted a written *ex parte* letter in the above proceedings, urging that the Commission adopt EOBC’s “Compromise Formula” for establishing opening prices in the broadcast Incentive Auction scheduled for next year.

WatchTV, Inc. (“WatchTV”) strongly supports EOBC’s Compromise Formula. WatchTV is the licensee of seven Class A television stations in the Pacific Northwest. I have visited the Commission several times, consistently supporting the Incentive Auction concept and stating that WatchTV will offer for sale however many of its stations the Commission wishes to purchase.

Congress intended that the Incentive Auction provide broadcasters with an opportunity to recoup the true and full market value of the spectrum their stations use. The Commission has consistently attempted to attract broadcasters to participate based on the argument that their spectrum is worth more if repurposed for wireless use than it is when used for television broadcasting and that the auction will offer an opportunity to realize this increased value. The Commission should remain true to the principle established by Congress and espoused by the agency, by offering opening prices that reflect both the impact of each station in terms of its preclusionary impact on wireless operations and the new value levels established by the marketplace in Auction No. 97. That is what EOBC is asking and is what the Commission should do.

I am still committed to offering WatchTV’s stations in the Incentive Auction, but I do want to realize their true full value; and I believe I am entitled to do so, as Congress and the Commission have both promised. Please carefully consider the EOBC Compromise Formula, and adopt EOBC’s suggestions.

Respectfully submitted,



Gregory J. Herman, President