



National Cable & Telecommunications Association
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March 6, 2015

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

Re: GN Docket No. 12-268

Dear Ms. Dortch:

On March 3, 2015, Diane Burstein and I, of the National Cable & Telecommunications Association (“NCTA”) met with the following Media Bureau staff: William Lake, Michelle Carey, Kim Matthews, Steve Broeckaert and Mary Beth Murphy and with the following members of the Incentive Auction Task Force: AJ Glusman and Dorann Bunkin. We discussed NCTA’s Opposition to the Petition for Reconsideration in the above-captioned proceeding.

NCTA reiterated its support for a successful auction. However, we explained that the Reconsideration Petition’s proposal to provide broadcasters with more than a year post-auction to decide whether to channel-share could adversely impact cable operations. This extended timeframe for settling on whether to continue broadcasting and from where could introduce unnecessary uncertainty and could adversely impact operators’ ability to be held harmless from the spectrum auction. NCTA also discussed the proposal to permit “second generation” channel sharing, and expressed concern that such a right to relocate many years after the auction could adversely affect a cable operator’s ability to seek reimbursement from the Relocation Fund for unreimbursed expenses related to channel sharing, contrary to legislative intent.

Respectfully submitted,

/s/ **Rick Chessen**

Rick Chessen

cc: W. Lake
M. Carey
K. Matthews
S. Broeckaert
M. Murphy
A. Glusman
D. Bunkin