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March 26, 2015

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

**Re: Notice of Ex Parte Communication
Expanding the Economic and Innovation Opportunities
of Spectrum Through Incentive Auctions,
GN Docket No. 12-268**

**Broadcast Incentive Auction Comment Public Notice
Auction 1000, 1001 and 1002
AU Docket No. 14-252**

Dear Ms. Dortch:

On March 24, 2015, Kevin Cuddihy, President, Local Media, John Eck, Executive Vice President, Technology, Operations and Engineering, and Jonathan Schwartz, Executive Vice President, General Counsel, all of Univision Communications Inc., and the undersigned met with Commissioner Jessica Rosenworcel and Valery Galasso, Policy Advisor to Commissioner Rosenworcel, regarding the referenced proceedings.

The Univision representatives explained that Univision is an established broadcaster with deep ties to its viewers and the Hispanic community. Univision assigns high value to its existing broadcast business and operations, but also is continually exploring new and creative ways to put its spectrum assets to work in order to serve its community. Accordingly, Univision supports the Commission's goal of a successful broadcast incentive auction. And, to that end, Univision, along with other major station group owners, has committed to work with the Commission and the Incentive Auction Task Force to help develop clear and effective auction rules that will maximize the value of the potential incentive auction opportunity for all broadcasters.

The Univision representatives discussed the importance of applying lessons learned from the success of the AWS-3 Auction 97 to the broadcast incentive auction, particularly with respect to transparency and simplicity in auction design and implementation. In particular, they proposed that the Commission set and publicize an initial clearing target of at least 126 MHz prior to the deadline for filing reverse auction applications in order to maximize broadcaster participation.

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They also urged the Commission to reduce the 20 percent impairment threshold that has been proposed in connection with the possible implementation of Dynamic Reserve Pricing. Because a high threshold is likely to result in impairment in the restructured 600 MHz band, it will lower demand in the forward auction -- which, in turn, will lower prices paid to broadcasters on the reverse side of the auction and deter broadcaster participation. Univision suggested that the Commission lower the impairment threshold to a range of between no more than three and five percent.

Finally, the Univision representatives emphasized the critical importance of channel sharing rules that promote flexibility and efficiency. They expressed concern that broadcasters interested in channel sharing will have insufficient time and inadequate information to negotiate definitive channel sharing agreements prior to submission of their reverse auction applications. Moreover, it will be difficult, if not impossible, to finalize channel sharing agreements without any knowledge of auction outcomes, which necessarily will affect the economic terms of such agreements. Univision also stated that greater clarity and flexibility is required with respect to the circumstances surrounding the expiration or termination of channel sharing agreements, including the rights and obligations of sharing stations in the event of a station sale.

The Univision representatives reiterated that Univision has engaged with the IATF and the Commission with the goal of achieving smart, clear auction rules to help facilitate maximum broadcaster participation. They also noted that Univision is working with other broadcasters to bring about constructive industry engagement to that end.

This letter is being submitted electronically pursuant to Section 1.1206(b) of the Commission's Rules. Please contact the undersigned if you have any questions about this submission.

Respectfully submitted,

/s/

Mace Rosenstein

Counsel for Univision
Communications Inc.

cc: Hon. Jessica Rosenworcel
Valery Galasso