



January 30, 2015

Federal Communications Commission
445 12th ST., S.W.
Washington, D.C. 20554

RE: PN No. 14-252 comments

We at QCommunications, LLC worked with 69 TV stations in the FCC Sprint/Nextel 2GHz relocation and anticipate in servicing TV stations with their efforts to comply with the Incentive Auction results. We have a further question that the answer to will further our understanding of the impact upon the TV stations and may help clarify the overall process each station may be obligated to perform in accordance with the proceedings and allow us to better services our clients to meet their FCC licensing requirements. To that end we submit this question for your consideration;

Cost recovery for non-repacked stations: If a station is not required to be repacked or does not have to move channels we believe the station should be able to recover any costs of preliminary or exploratory measures to make ready to meet the FCC's relocation requirements to be repacked. Since the FCC is the one assigning the channels each station has to be ready to consider all alternatives to be repacked and should be doing so now in advance and preparation of the order and hence we believe any and all costs expended in that effort are reimbursable to the station as part of the TV Repack both internal and outsourced costs associated with the Repack effort. Many stations, between now and the Repack channel assignment, will be performing engineering studies and inventories and meeting with equipment and service vendors and legal counsel in an effort to determine how to cooperate with any forced channel realignment or assignment.

For a station that is not selected or required to be repacked these upfront costs that are solely expended to cooperate with the FCC should be fully reimbursed. In the event that a station is not repacked and incurs such costs, will these costs be fully reimbursed and if yes, on what terms?

Respectfully yours,

Tony zumMallen
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