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May 18, 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 May 14, 2015, Erik Moreno, Jared Sher and Joseph Di Scipio of Fox Television Stations Inc., Dan Hsieh and Mark Barrington of ION Media Networks, Inc., Edward Lazarus of Tribune Media Company, John Eck, John Buegler, and Christopher Wood of Univision Communications Inc., and Richard Oh of Rockdale Partners (the “Broadcaster Representatives”), and the undersigned met regarding the referenced proceedings with Commission representatives Howard Symons, Gary Epstein, William Lake, William Scher, Dorann Bunkin, Lawrence Chu, Melissa Dunford, Sasha Javid, Mary Margaret Jackson, Rachel Kazan, Julissa Marenco, Margaret Wiener, Martha Stancill, Erik Salovaara, and Mark Colombo.

The Broadcaster Representatives suggested that the Commission could help maximize broadcaster participation in the incentive auction by stating clearly – prior to the deadline for submission of reverse auction applications – a 126 MHz clearing target. They also stated that, in any case, publication of an auction clearing target in advance of the auction will be a critical input for broadcasters to evaluate their reserve pricing strategy and potential auction participation.

Relatedly, the Broadcaster Representatives urged the Commission to limit the extent of impaired spectrum in connection with incentive auction design and execution. They stated that they are not supportive of the “Dynamic Reserve Pricing” (“DRP”) proposal because they believe, based on their own modeling, that it would depress broadcaster participation and result in a sub-optimal clearing target. They stated that, although DRP may be a means for the Commission to retain flexibility in border markets, it should not be deployed in large markets where station participation will be sufficient to help ensure an optimal clearing target.

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Finally, the Broadcaster Representatives discussed various hypothetical channel sharing scenarios and asked questions regarding the implementation of those scenarios under the Commission's proposed channel sharing rules.

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 Fox Television  
Stations, Inc., ION Media  
Networks, Inc., Tribune  
Media Company and  
Univision Communications  
Inc.

cc: Howard Symons  
Gary Epstein  
William Lake  
William Scher  
Dorann Bunkin  
Lawrence Chu  
Melissa Dunford  
Sasha Javid  
Mary Margaret Jackson  
Rachel Kazan  
Julissa Marenco  
Margaret Wiener  
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Erik Salovaara  
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