



June 30, 2015

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

Re: Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television and Television Translator Stations (Docket No. 03-185); In the Matter of Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions (Docket No. 12-268); Amendment of Part 15 of the Commission's Rules to Eliminate the Analog Tuner Requirement (Docket No. 14-175)

Dear Ms. Dortch:

This letter is to notify you that on June 29, 2015, Lonna Thompson, Executive Vice President, Chief Operating Officer and General Counsel, and Jonathan Mark, Legal Intern, of the Association of Public Television Stations; and Thomas Rosen, Senior Counsel, of the Public Broadcasting Service (collectively, "PTV") met with Michelle Carey, Mary Beth Murphy, Brendan Murray, Lynne Montgomery, and Jaclyn Haughom of the Federal Communications Commission Media Bureau.

PTV expressed appreciation for the Media Bureau's decision to suspend the September 2015 digital transition date for television translator stations. As the Bureau noted in its Public Notice dated April 24, 2015, the broadcast television spectrum incentive auction and repacking process will potentially displace a significant number of television translator stations and, therefore, it is prudent to postpone the digital transition date to avoid requiring analog stations to incur the costs of transitioning to digital when such investment could soon be rendered obsolete by the auction and repacking process.

PTV urged the Media Bureau to ensure that this deferral of the deadline for completing the digital transition for television translator stations is reflected in the corresponding phase-out of the analog tuner requirement. Given the Commission's current plan to hold the auction in early 2016, and the findings of the Widelity Report on the timeframe for repacking, the transition is unlikely to be complete until 2019 at the earliest. In the interim, many viewers will continue to be served by analog translators. To avoid disruption to these viewers, the Commission should not phase out the analog tuner requirement prematurely.

PTV explained that there continue to be well over 200 analog translators in the public broadcasting system. While PTV stations have worked diligently to transition their translators to digital, this transition is complicated by a significant number of operational and financial challenges, combined with the uncertainty of the incentive auction and repacking process. Stations at this point need to wait until after the incentive auction to evaluate where in the television band to locate their translators in order to avoid having to “double build” digital facilities.

PTV noted that it may be appropriate to provide equipment manufactures some leeway to wind down their manufacturing of new equipment with analog tuners. For instance, the Commission could apply percentage thresholds for equipment with analog tuners in the months leading up to the digital transition for television translators, along the lines of the phase-in of digital tuners during the full-power digital transition, provided that manufacturers continue to make equipment with analog tuners readily available until closer to the time of the post-auction digital transition deadline.

PTV looks forward to continuing to work with the Media Bureau to ensure that the vital role of television translators in providing public broadcasting service to much of the American public is preserved following the incentive auction, repacking process, and digital transition.

Regards,

/s/ Lonna Thompson
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