

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions	)	GN Docket No. 12-268
	)	
Policies Regarding Mobile Spectrum Holdings	)	GN Docket No. 12-269
	)	
Broadcast Incentive Auction Comment Public Notice Auction 1000, 1001 and 1002	)	AU Docket No. 14-252
	)	

**COMMENTS OF  
EXPANDING OPPORTUNITIES FOR BROADCASTERS COALITION**

The Expanding Opportunities for Broadcasters Coalition (the “Coalition”)<sup>1</sup> respectfully submits these comments in response to the letter submitted into the record of the above-referenced proceedings on July 10, 2015 by Incentive Auction Task Force Chair Gary M. Epstein and the accompanying simulation data and analyses.<sup>2</sup>

There is concern at the FCC about achieving robust clearing targets, about not impairing the 600 MHz spectrum to be sold to carriers, and about not impairing the Duplex Gap. The key

---

<sup>1</sup> Pursuant to the Public Notice issued on December 18, 2012 (DA 12-2040), these comments represent the views of a coalition of broadcasters who own or have financial interests in more than 85 auction-eligible stations and who desire to remain anonymous at this time. Together, the Coalition members own both full power and Class A television stations in a number of markets, including stations in eight of the ten largest DMAs. The individual members of the Coalition may not agree with all positions taken in these comments. The Coalition’s name and mailing address are provided in accordance with Section 1.419 of the Commission’s rules. *See* 47 C.F.R. § 1.419(d).

<sup>2</sup> *See* Letter from Gary M. Epstein, Chair, Incentive Auction Task Force, to Marlene H. Dortch, Secretary, GN Docket No. 12-268; WT Docket No. 12-269; AU Docket No. 14-252 (July 10, 2015), *available at* <http://apps.fcc.gov/ecfs/document/view?id=60001114813> (the “Epstein Letter”); FCC, *Data PN Runs*, GN Docket No. 12-268; WT Docket No. 12-269; AU Docket No. 14-252 (July 10, 2015), *available at* <http://apps.fcc.gov/ecfs/document/view?id=60001114814> (the “Simulation Data”).

to solving these concerns is to stimulate more television stations to participate in the reverse auction. The key to that is money. By simply increasing prices offered to all broadcasters (consistent with our Coalition's pricing proposals), more television stations will participate, and as the FCC's own simulations show, higher participation makes the clearing target and impairment problems go away.

Respectfully submitted,

By: /s/ \_\_\_\_\_  
Preston Padden  
Executive Director  
EXPANDING OPPORTUNITIES FOR  
BROADCASTERS COALITION  
1301 Canyon Blvd #306  
Boulder, Colorado 80302  
(202) 329-4750  
ppadden@me.com

July 13, 2015