



July 17, 2015

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268; Policies Regarding Mobile Spectrum Holdings, WT Docket No. 12-269; Comment Sought on Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auctions 1001 and 1002, AU Docket No. 14-252, Notice of *Ex Parte* Communication

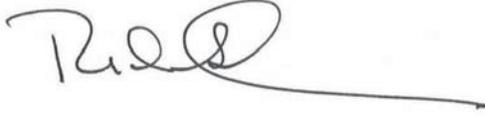
Dear Ms. Dortch:

On July 15, 2015, Bruce Franca, Robert Weller, Patrick McFadden, and the undersigned, all of the National Association of Broadcasters, met with Commissioner Rosenworcel and her Policy Advisor, Valery Galasso. In a separate telephone conference, the undersigned also spoke with David Strickland of Commissioner Clyburn's office. NAB expressed disappointment in the Chairman's decision to delay the vote on the Procedures Public Notice, rather than move forward with an item that preserved the Commission's balanced compromise to preserve the duplex gap for use by unlicensed users and wireless microphones.

NAB also discussed a potential proposal floated by FCC staff to resolve concerns over impairment of the duplex gap by reserving a second channel not currently occupied by a full-power broadcaster (the so-called and inaptly-named "vacant channel") for unlicensed operation in those markets where the duplex gap is impaired. Such a proposal is wholly inadequate. First, the offer is largely illusory. In many of the most congested markets, there will likely not be a single channel to designate for TV white spaces operation, let alone a second one. Indeed, according to the comprehensive data on repacking the FCC released last year, there will not be a second channel for personal/portable unlicensed devices in nine of the top 10 markets. Second, this proposal would not address the elimination of reserved spectrum for exclusive use by wireless microphones to cover breaking news. Finally, this proposal will deal yet another blow to TV translators and low power television stations, as it will further reduce the available spectrum for their non-voluntary relocation.

1771 N Street NW  
Washington DC 20036 2800  
Phone 202 429 5300

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right.

Rick Kaplan  
General Counsel and Executive Vice President,  
Legal and Regulatory Affairs  
National Association of Broadcasters

cc: Commissioner Jessica Rosenworcel  
Valery Galasso  
David Strickland