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SAN DIEGO SAN FRANCISCO SEOUL
SHANGHAI SILICON VALLEY WASHINGTON

Mace Rosenstein

Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 5460
mrosenstein@cov.com

July 22, 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 July 20, 2015, Erik Moreno, Joseph Di Scipio and Jared Sher of Fox Television Stations Inc., Brandon Burgess and Dan Hsieh of ION Media Networks, Inc., Edward Lazarus of Tribune Media Company, John Eck and John Buegler of Univision Communications Inc., and the undersigned (the "Broadcaster Representatives"), participated in a telephone conference regarding the referenced proceedings with Howard Symons, Gary Epstein, William Lake, William Scher, Dorann Bunkin, Mary Margaret Jackson, Margaret Wiener, Erik Salovaara, and Paul Milgrom and Ilya Segal of Stanford University, all on behalf of the Commission.

The Broadcaster Representatives and Commission staff and consultants discussed several matters related to the Commission's stated goal of maximizing broadcaster participation in the incentive auction. As in previous meetings and calls, the Broadcaster Representatives emphasized that they are evaluating whether and how to participate in the incentive auction from the perspective of licensees that assign high value to their existing broadcast operations and intend to continue to deliver robust over-the-air services to their communities following the auction.

The Broadcaster Representatives thanked the staff for their recent clarification of the methodology for determining the national clearing target in the reverse auction. The Broadcaster Representatives urged the Commission to set a 126 MHz clearing target prior to the deadline for submission of reverse auction applications as a way to maximize broadcaster participation and afford the Commission flexibility in the repacking process. They also urged the Commission to ensure that stations with a high share of over-the-air viewing will not be relocated to impaired spectrum in the repacking.

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The Broadcaster Representatives also urged the Commission to afford broadcasters greater flexibility in structuring and managing channel sharing arrangements. The Broadcaster Representatives explained that restrictions on communication among employees of a broadcaster that has entered into channel sharing agreements with other broadcasters in multiple markets -- in particular, a requirement that the broadcaster designate separate, screened employees to execute its bidding strategy in each market -- would impose unreasonable and possibly insurmountable administrative burdens. They explained, further, that such a requirement would appear to preclude any communication by such employees with corporate management or boards of directors regarding auction outcomes in a particular market while the auction is ongoing. They observed that these limitations could deter broadcaster participation in the auction. The Broadcaster Representatives and Commission staff also discussed the feasibility of bidding agency arrangements, pursuant to which a designated agent would execute a broadcaster's bidding strategy across multiple markets pursuant to instructions provided prior to the commencement of the auction.

In addition, the Broadcaster Representatives urged the Commission to permit broadcasters to enter into more than one contingent channel sharing agreement in each market in which they propose to participate in the auction. Multiple contingent channel sharing arrangements could incentivize auction participation by enabling broadcasters to ensure that they would continue to have a potential channel sharing partner in the event they or other prospective partners are frozen in the auction.

Finally, the Broadcaster Representatives urged the Commission to afford broadcasters that have entered into channel sharing agreements (or have stated their intent to enter into a CSA following the auction) and are successful bidders in the auction additional time -- up to twelve months -- to cease operations on their current channel without the need to seek a waiver or other relief from the Commission. They explained that a longer transition period would afford greater flexibility and lower implementation risk for auction participants without adversely affecting the Commission's post-auction repacking timeline.

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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
Mary Margaret Jackson
Margaret Wiener
Erik Salovaara
Paul Milgrom
Ilya Segal