

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
Amendment of Parts 15, 73 and 74 of the)	MB Docket No. 15-146
Commission's Rules to Provide for the)	
Preservation of One Vacant Channel in the)	
UHF Television Band For Use By White)	
Space Devices And Wireless Microphones)	
Expanding the Economic and Innovation)	GN Docket No. 12-268
Opportunities of Spectrum Through)	
Incentive Auctions)	

**IN SUPPORT OF A MOTION FOR
EXTENSION OF TIME OF THE NATIONAL
ASSOCIATION OF BROADCASTERS**

The LPTV Spectrum Rights Coalition ("Coalition")¹, files this notice in support of the National Association of Broadcasters ("NAB"), limited extension of the deadline for filing comments on the Commission's proposal to preserve one television channel for use by TV White Space Devices and wireless microphones following the broadcast spectrum incentive auction.² Comments are currently due by August 3, 2015, and reply comments are due by August 31, 2015. Pursuant to Section 1.46 of the Commission's rules,³ the Coalition supports the NAB request for a 21-day extension of the comment deadline, such that comments would be due by August 24, 2015, and reply comments would be due by September 23, 2015.

¹ The LPTV Spectrum Rights Coalition is an industry association that advocates on behalf of free local LPTV and TV translator television stations and other industry members before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² *Amendment of Parts 15, 73 and 74 of the Commission's Rules to Provide for the Preservation of One Vacant Channel in the UHF Television Band For Use By White Space Devices and Wireless Microphones*, Notice of Proposed Rulemaking, MB Docket No. 15-146, GN Docket No. 12-268, FCC 15-68 (June 16, 2015).

³ 47 C.F.R. § 1.46(b).

The Coalition believes that a limited extension of time is in the public interest in light of new issues that have arisen with respect to the question of whether and how to reserve a television channel in the UHF band following the auction. The issue of available spectrum for unlicensed uses and wireless microphones is closely connected to the question of whether, and in how many markets, the Commission elects to relocate television stations in the duplex gap following the auction. This issue is of utmost importance to our Coalition, in that in those markets which may have a need for use of the duplex gap, are the very markets in which LPTV and TV translators may be most at risk for displacement and not having a channel to repack into.

The Coalition submits that the Commission will have a better; more informed record in this proceeding, if comments are filed after the release of the forthcoming Procedures Public Notice. Because the vote on the Procedures Public Notice was delayed by three weeks, The Coalition supports the NAB request for a three-week delay in the comment deadline in this proceeding would be appropriate. And we believe this request will not hinder the FCC from still initiating the incentive auction in early 2016.

The LPTV industry has not be given any impact analysis of the various band plans, and these extra three weeks will give us the time needed to both study and comment on the plans with the new information and data now available.

Respectfully submitted

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