



**LPTV  
SPECTRUM  
RIGHTS  
COALITION**

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**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Ex Parte Meeting Regarding GN Docket No. 12-268: Expanding the  
Economic and Innovation Opportunities of Spectrum Through Incentive  
Auctions**

Dear Ms. Dortch:

Michael Gravino, Director of the LPTV Spectrum Rights Coalition, (the "Coalition"), met on August 18, 2015 with the Incentive Auction Task Force, including Vice Chair Howard Symons, and staff member, Mary Margaret Jackson. Also attending was Michelle Carey, Deputy Bureau Chief, Media Bureau, and Julius Knapp, Chief, Office of Engineering Technology (OET); as well as staff from both the Video Division and OET.

The Coalition provided a new line of "civic broadcasting" research related to the FCC's Vacant Channel rule making, and the Incentive Auction repacking process. The following information was presented in the meeting:



## **LPTV & TV TRANSLATOR CIVIC BROADCASTING RESEARCH RELATED TO THE INCENTIVE AUCTION**

**More than 200 local government entities  
are licensees of more than  
2400 LPTV and TV translator stations....**

**800 are VHF 2-13**

**600 are UHF 14-27**

**1000 are UHF 28-51**

**At an average displacement cost of \$150k  
for displacement relocation hard and soft costs**

**The impact of the incentive auction  
on the "civic broadcasting" sector  
is as much as \$360 million!**

The Coalition announced that it could get behind the concept of the Vacant Channel order, and would support the FCC exercising its statutory authority related to the repurposing of the TV band in the manner it has described, but that a priority over unlicensed users must be made to these government entities and their stations. If no priority is given then the FCC is adhering to its overall mandate of acting in the public interest, and that since THE FCC HAS NOT STUDIED THIS ISSUE AT ALL, IT HAS NO BASIS FOR USING ITS DISCRETIONARY AUTHORITY.

We further discussed various issues from the 3rd NPRM, and the timing of it being sent to the Commissioners for a vote. Of great interest was the proposed MX, or mutual displacement process, which many large markets could be facing. The Coalition asked for an update of the MX rules since they are not in sync with the Incentive Auction process.

Respectfully submitted,

Mike Gravino, Director  
LPTV Spectrum Rights Coalition  
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