

**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
)	
Channel Sharing by Full Power and Class A Stations Outside the Broadcast Television Spectrum Incentive Auction Context)	MB Docket No. 15-137
)	

REPLY COMMENTS OF MEDIA GENERAL, INC.¹

Media General owns and operates broadcast television stations in 48 markets and is one of the nation’s largest connected-screen media companies. The company supports the Commission’s proposals that would allow for voluntary, flexible channel sharing agreements (“CSAs”) outside the context of the incentive auction. Media General also agrees with the NPRM’s proposal and comments of the National Association of Broadcasters that the Commission’s post-auction sharing rules should mirror the rules governing CSAs entered into as part of the incentive auction.² Additionally, Media General agrees with the NPRM that stations that agree to engage in channel sharing outside of the auction must retain satellite carriage, cable carriage, and retransmission consent rights.³

However, given that the agency offers no incentive for a licensee to vacate a post-auction channel and voluntarily cede very valuable spectrum by entering into a CSA, Media General

¹ Media General, Inc. (“Media General”) hereby submits comments in response to the Commission’s Notice of Proposed Rulemaking in the above-captioned proceeding. *See Channel Sharing by Full Power and Class A Stations Outside the Broadcast Television Spectrum Incentive Auction Context*, First Order on Reconsideration and Notice of Proposed Rulemaking, FCC 15-67 (rel. June 12, 2015) (“*Recon Order*” and “*NPRM*”).

² *NPRM*, para. 46; Comments of the National Association of Broadcasters, at 1-2.

³ *See NPRM*, para. 33.

questions the practical utility of this rulemaking for *broadcasters* that did not relinquish spectrum as part of the incentive auction. If the Commission is interested in motivating post-auction CSAs, it should consider meaningful incentives for stations to cede spectrum, such as exempting stations that enter into CSAs from the FCC’s multiple ownership rules.⁴

Moreover, Media General urges the Commission to clarify that the *Commission’s* incentive of “spectral efficiency” for post-auction CSAs does not involve piecemeal removal of bandwidth from the television band. That is why Media General strongly supports NAB’s statements that the “current rules should apply to any new vacant channels created by channel sharing outside the auction context” and that these channels “should remain allocated for television use and be available for white spaces devices unless . . . occupied by a television station.”⁵ Post-auction CSAs should not have the unintended, anti-competitive consequence of reducing business opportunities and the technological advancements of other stations in the market.

Respectfully Submitted,

Media General, Inc.

By: _____/s/_____
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⁴ See 47 C.F.R. 73.3525.

⁵ Comments of NAB, at 3.