

September 14, 2014

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Notice of Ex Parte Communication in MB Docket Nos. 10-71 and 13-249, and
GN Docket No. 12-268

Dear Ms. Dortch:

This letter documents an in-person meeting between the attached list of broadcasters and broadcast representatives, the Colorado Broadcasters Association, Senator Cory Gardner and his Deputy Chief of Staff, Natalie Rogers, Regional Director, Jorge Delgado, Regional Scheduler Alison Kohn and Commissioner Ajit Pai and his Legal Advisor Brendan Carr held on Saturday, September 12, 2015. We want to thank Commissioner Pai and Mr. Carr for accommodating a Saturday meeting with Colorado's broadcasters and broadcast representatives.

In the meeting, Commissioner Pai and Mr. Carr heard from a passionate group of broadcasters about the many ways they serve their local communities. The broadcasters highlighted several community events that their radio and television stations provide for those in need. It was noted that a recent Amber Alert had quickly returned an abducted girl to safety, based on the tips authorities received from another woman who received the Amber Alert from local broadcasters. No other entity carries the mandated responsibility of a nationwide emergency alert system like that of radio and television broadcasters.

Three major topics were discussed during the meeting. First, broadcasters asked why Syndication Exclusivity and Network Non-Duplication rules were up for elimination. It was noted that the removal of these rules would ultimately make the negotiation process, with cable and satellite, an unfair fight. Broadcaster's ability to focus on localism is stronger than it has ever been and the elimination of these rules would undermine the level of localism broadcasters now provide. The proposed deregulation specifically targets an area that keeps these negotiations on a level playing field. There was confusion as to why these regulations are now being viewed as a problem when they have worked so well for many years.

Cable and satellite platforms are not interested in supporting and serving local communities, as was proven with Colorado's recent string of wildfires and flooding. Colorado communities relied on local broadcasters for warnings, alerts, evacuation notices and the mass distribution of information from local authorities. After the fires

and flooding subsided, local broadcasters continued to support their communities ultimately assisting in rebuilding the very communities they serve. Cable and satellite operators were nowhere to be seen during that process. The deregulation of these rules undermines local broadcasters, eliminating smaller market stations and burdening the large market stations with the responsibility of serving those soon-to-be underserved, smaller communities.

Second, the broadcasters voiced concerns surrounding the Spectrum Auction and its significant shortfall of reimbursement funding as well as the extremely tight deadline of 39 months for all stations to complete their relocation. This is an immense project for any size station and the resources are scarce. There are only a handful of people who do this work and current jobs take 7 to 8 months to complete for a single station. Colorado poses a unique problem with its winters, a time when the cold, ice and winds prevent trenching transmission lines or climbing towers.

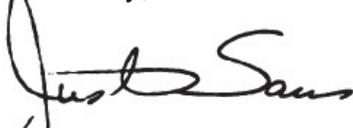
The broadcasters reflected on how well the Colorado communities worked together for the DTV transition, recalling how some even crawled into attic spaces, at the request of elderly or disabled viewers, to setup their antennas. Repacking is going to require an aggressive education of the public and the reimbursement funding shortfall is going to significantly hinder those efforts.

Finally, the importance of AM Revitalization was addressed. Technology is chopping away at the core of AM broadcast with interference issues. Translators will provide relief to many of these AM broadcasters, giving them the ability to serve their communities with less interference and, in some cases, full-time.

There are a finite number of translators. It is critical that an AM-only translator window be reintroduced, to give rural AM broadcasters the ability to participate. Without an AM-only translator window, bidding wars are inevitable and will likely push aside the many smaller AM operators that may eventually cease to exist without this form of revitalization.

The Colorado broadcasters are genuinely appreciative that Commissioner Pai came to Colorado to meet with the very people the Commission oversees. All of the broadcasters in attendance are happy to facilitate further dialog or answer questions that the Commissioner has as the above issues proceed.

Sincerely,

A handwritten signature in black ink that reads "Justin Sasso". The signature is written in a cursive, flowing style.

Justin Sasso
Colorado Broadcasters Association

Broadcasters and Broadcaster Representatives also in attendance included:

- Greg Armstrong, KCDO, Denver, CO
- Bob Call, Bonneville International, Denver, CO
- Mark Cornetta, TEGNA, Denver, CO
- Steve Dant, KXRM/KXTU, Colorado Springs, CO
- Walt DeHaven, KCNC, Denver, CO
- Evan Pappas, KOAA, Colorado Springs, CO
- Lindsay Radford, E.W. Scripps Company, Denver, CO
- Sarah Weber, Colorado Broadcasters Association, Denver, CO
- Jorge Delgado, Office of Senator Cory Gardner
- Senator Cory Gardner, CO
- Allison Kohn, Office of Senator Cory Gardner
- Natalie Rogers, Office of Senator Cory Gardner