

November 6, 2015

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

Re: Expanding the Economic and Innovation Opportunities of Spectrum Through
Incentive Auctions, GN Docket No. 12-268

Dear Ms. Dortch:

On December 30, 2013, the FCC released a report completed by Widelity, Inc. (the "Widelity Report") analyzing the estimated time and costs required for individual television stations to move to a new channel assignment following the incentive auction. While this report is useful in certain respects, it did not analyze the time and financial resources that might be required to complete a nationwide repacking of the scope contemplated by the Commission.

To help inform the Commission as it grapples with the task of a nationwide broadcaster repack, Digital Tech Consulting, Inc. (DTC) was commissioned by the National Association of Broadcasters to study the time and costs associated with the relocation of a large number of television stations following the auction. A copy of our analysis (the "DTC Study") is attached. The DTC Study provides an in-depth look at the various considerations involved in repacking hundreds of stations across the country. It is based on surveys and in-depth interviews with the principal companies, owners and executives that will be directly involved in supplying broadcasters with services and equipment needed to move to a new channel, as well as publicly available FCC data. The DTC Study is the only such comprehensive analysis of which we are aware, and we hope it meaningfully enhances the record in this proceeding with respect to the repacking process.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Myra Moore".

Myra Moore
President
Digital Tech Consulting, Inc.