



December 2, 2015

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: *Assessment and Collection of Regulatory Fees for Fiscal Year 2015,*  
*MD Docket No. 15-121*

Dear Ms. Dortch:

On November 24, 2015, the undersigned of the National Association of Broadcasters (NAB) met with Tom Buckley, Mika Savir and Roland Helvajian to discuss the above-captioned proceeding. We discussed the potential impact of the upcoming spectrum incentive auction on regulatory fees assessed to television stations.<sup>1</sup> NAB explained that hundreds of television stations may surrender their rights to use television spectrum in exchange for a share of the proceeds from an auction of new licenses to use the repurposed spectrum for wireless broadband service. As a result, absent Commission action, television stations remaining after the auction will incur untenable increases in regulatory fees. NAB noted that the Commission has routinely reallocated fees to reflect marketplace changes, and that doing so for television stations following the auction would be consistent with the Commission's principal aim that the regulatory fee process should be fair.

Accordingly, NAB urged the Commission to consider reallocating a share of the fees assessed to television stations to reflect the spectrum to be repurposed for the benefit of wireless broadband providers. The auction will allow wireless providers to improve service and enlist more customers, thereby demanding more Commission oversight and justifying an attendant increase in regulatory fees. This approach is the most equitable way to fulfill the requirement under the Communications Act that regulatory fee assessments must be linked to the nature of the Commission's activities.<sup>2</sup>

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<sup>1</sup> *Assessment and Collection of Regulatory Fees for Fiscal Year 2015*, Report and Order and Further Notice of Proposed Rulemaking, MD Docket No. 15-121 (Sep. 2, 2015), at ¶ 30.

<sup>2</sup> 47 U.S.C. § 159(a), Public Law 113-235, Consolidated and Further Continuing Appropriation Act of 2015.

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Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Larry A. Walke". The signature is fluid and cursive, with the first name "Larry" being the most prominent.

Larry Walke  
Associate General Counsel  
Legal and Regulatory Affairs  
National Association of Broadcasters

cc: Tom Buckley  
Mika Savir  
Roland Helvajian