



**LPTV
SPECTRUM
RIGHTS
COALITION**

**MIKE GRAVINO
DIRECTOR**

WWW.LPTVCOALITION.COM
LPTVCOALITION@GMAIL.COM
(202) 604-0747

December 3, 2015

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th 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; and, MB Docket No. 03-185.

Dear Ms. Dortch:

Michael Gravino, Director of the LPTV Spectrum Rights Coalition, (the "Coalition"), met on December 3, 2015, with Johanna R. Thomas, who is Legal Advisor to Commissioner Rosenworcel. Our meeting covered the following points:

1. The Coalition asked about key LPTV and TV translator issues currently under consideration in the 3rd LPTV NPRM Report & Order.
2. The Coalition described a post-auction repacking environment where lots of spectrum in each market would not be able to be used for years while licensees and permittees all move around. We reviewed Coalition research into each

DMA, the amount of available LPTV and TV translator licenses and permits, and how those map into population counts.

3. The Coalition presented research to show that in most TV markets, multiple LPTV and translator stations already share channels, with some markets having 5+ stations on the same channel in a large geographically disperse market. This is an important consideration in any review of proposal from Microsoft and Google, and the TV white space industry, each wanting 18 MHz for their own purposes. Reserving channels for unlicensed and TV white space in a TV “DMA” could end up displacing many more stations than channels, since in many markets there are multiple stations on the same channel.
4. The Coalition presented research to show that TV broadcasters combined, from primary, NCE, Class A, LPTV, and translators, collectively have 6 billion coverage pops, or 36 billion MHz. About 1750 primaries have 4 billion, Class A’s about 500 million, and LPTV and translators about 1.6 billion coverage pops. We further discussed how these statistics would change post auction, and how unlicensed spectrum could be provisioned using LPTV and translator spectrum not currently in use.
5. We discussed the Vacant channel proposal, why it is needed in the markets which are constrained, and why it is not appropriate in all markets. We further discussed a potential better mechanism for achieving the spectrum needs of broadcasters, wireless mic’s, TV white space, and unlicensed users.

Respectfully submitted,

Mike Gravino, Director
LPTV Spectrum Rights Coalition
_____/S/____