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December 18, 2015

EX PARTE VIA ECFS

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

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

Dear Ms. Dortch:

On December 16, 2015, representatives Joan Marsh and the undersigned of AT&T met with Gary Epstein, Howard Symons and Sasha Javid of the Incentive Auction Task Force, Paul Malmud and Blaise Scinto of the Wireless Bureau, and Michelle Carey, Pam Gallant and Barbara Kreisman of the Media Bureau. Participating via teleconference for AT&T were Michael Goggin, Tom Lowe and Terry Chevalier.

The purpose of the meeting was to explore in more detail what an organized, efficient and expeditious broadcaster repacking process will entail.

More specifically, we noted that our simulations to date suggest that, post-auction, on average 1200 stations will remain to be repacked in the lower 600 MHz band. When analyzed at different clearing targets, AT&T simulations produced the following results:

At 84 MHz, an average of 1186 stations remained to be repacked in available solutions;

At 108 Mhz, an average of 1196 stations remained to be repacked in available solutions;
and

At 114 Mhz, an average of 1219 stations remained to be repacked in available solutions

Data available to date suggests that the FCC will be able to optimize any repacking solution so up to 30% of remaining broadcasters will be able to maintain their current channel assignment, which suggests that, on average, around 850 stations will be given a new channel assignment post-auction and will have to either retune or move to that new assignment. Given agreements with the Canadian and Mexican governments to protect certain channel assignments at the border, the ultimate number of re-assigned channels could be even higher.

During the meeting, AT&T noted the need for a repacking process that is as efficient and expedited as possible, asked questions about how the repacking schedule will be constructed and when forward auction bidders can expect to gain access to their licenses.

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If you have any questions or need additional information, please do not hesitate to contact me.

Respectfully submitted,

Brian Benison

cc: Gary Epstein
Howard Symons
Sasha Javid
Paul Malmud
Blaise Scinto
Michelle Carey
Pam Gallant
Barbara Kreisman