



**LPTV  
SPECTRUM  
RIGHTS  
COALITION**

**MIKE GRAVINO  
DIRECTOR**

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

December 17, 2015

Ms. Marlene H. Dortch  
Secretary  
Federal Communications  
Commission 445 12<sup>th</sup> 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; Amendment of Parts 15, 73 and 74 of the Commission's Rules to Provide for the Preservation of One Vacant Channel in the UHF Television Band For Use By White Space Devices and Wireless Microphones; Notice of Ex Parte Communication

Dear Ms. Dortch:

Michael Gravino, Director of the LPTV Spectrum Rights Coalition, (the "Coalition"), met on December 8, 2015, with Matthew Berry of Commissioner Pai's office; on December 14, 2015 with Edward Smith in Chairman Wheeler's office;, and via telephone on December 14, 2015 with Chanelle Hardy of Commissioner Clyburn's office.

Our conversations 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 50% of all LPTV and TV translator spectrum is within the top 25 markets.
5. We discussed the vacant channel propos 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  
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