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March 21, 2016

By Electronic Filing

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

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

Dear Ms. Dortch,

This letter is submitted, pursuant to Section 1.1206(b)(1) of the FCC's rules, to notify you of a meeting held March 18, 2016, among representatives of American Tower Corporation ("ATC") and the FCC staff. The meeting was intended to update the staff regarding the steps ATC has undertaken to prepare for the repack of TV licensees following the Incentive Auction. Representing ATC were Peter Starke, Vice President – Broadcast; Paul Roberts, Vice President – Compliance; and ATC's undersigned counsel. Attending from the FCC staff were Howard Symons, Barbara Kreisman, Pam Gallant, Hillary deNigro, and Sasha Javid. ATC discussed the issues identified in the attached presentation.

Please contact the undersigned if you have any questions.

Sincerely,

/s/
Christine M. Crowe
Timothy J. Cooney

cc: Howard Symons
Barbara Kreisman
Pam Gallant
Hillary DeNigro
Sasha Javid

FCC – TV Incentive Auction

American Tower Pre Auction Planning

UPDATE

March 18, 2016

AMERICAN TOWER®

Agenda

- American Tower Corporation (ATC) TV Transmission Facilities (Update)
- ATC Pre Repack Planning Goals (Recap)
- Pre Auction/Repack Preparation (Update)
- Repack Costs and Timing Risks (Update)
- Summary
- Ask

ATC – TV Transmission Facilities (Update)

- **367** Full Power and Class A stations operate on owned, managed, & leased sites
- **186** towers with **ALL** FP and Class A service types – DT, DC, DX, DD
- **178** towers with at least **one** Full power/Class A TV
- **79** towers with **2+** Full Power/Class A TV
- **108** towers with channels **Ch. 32+** (assuming a 108 MHz clearing target)
- **65** "Complex" sites (Candelabra, Mountaintop, Broadband Antenna)
- **29** owned and operated Broadband UHF antenna systems
- **91** DMAs with towers supporting TV transmission

"Repack will have a tremendous impact on ATC sites"

ATC Pre Repack Planning Goals (Recap)

- **Speed to Market** – Focused on meeting FCC's repack deadline
- **Operational Ease** – Manage entire process, reduces complexity, deliver highest level of service
- **Minimize OTA Downtime** - Lessen off-air for all tower tenants
- **Turnkey Offers** – Propose complete, end-to-end solutions
- **Future-Proof Solutions** – Runway to next-gen broadcast standards
- **Transmission Redundancy** – Pre and post re-pack back up sites
- **Technical Superiority** – RF and tower structure expertise
- **Industry Leadership** – Trusted "Go-to" team with focus on broadcast customers and towers

"ATC is committed to developing a successful Repack program"

Pre Auction/Repack Preparation (Update)

- ***TV Licensee Outreach***
  - Repack meetings held with over 20 group and single station owners representing over 400 Full Power and Class A Licenses
    - Positive feedback to pre construction planning
    - Positive feedback to broadband antenna concept
    - Concern over remaining on-the-air during tower repack work
    - Concern over rent increases for additional and possibly larger equipment
    - Concern over non eligible reimbursement expenses
  - Quiet Period has limited some planning discussions

"Valuable TV Licensee input"

Pre Auction/Repack Preparation (Update)

- ***FM Licensee Outreach***
  - Meetings held with FM's operating from ATC TV towers.
    - Discussed TV Repack disruption preparedness
    - Major concern over powering down or off-air for extended periods of time
    - Recognize the value of auxiliary antennas
      - Not willing to invest money now
      - Expect someone else to pay for it when the time comes

"Further assessment required for maintaining FM service"

Pre Auction/Repack Preparation (Update)

- ***ATC Internal Resources***
  - Repack plan established with operations and customer support groups:
    - **ATC Engineering** – Structural analysis assessment
    - **Redevelopment** – Tower modifications and site upgrade analysis
    - **Broadcast Operations** – Site impact planning
    - **Regulatory** – Local, state and federal requirement review
    - **Legal** – TV tenant lease review
    - **Finance** – CapEx budget review and spending projection
    - **Procurement** – Purchasing and vendor management review
    - **Accounting** – Establish reimbursement billing program
    - **Business Development** – Customer repack solutions development

"ATC internal resources in place for the channel allocation release"

Pre Auction/Repack Preparation (Update)

- ***External Resources***
  - Network of businesses supporting ATC and Licensee repack efforts
    - **Broadband Antennas, Combiners, Filters** – Established design and supply programs with multiple RF OEMs
    - **Tower Construction** – Vetted crews based on past history and rigging expertise. Establishing program ensuring crews are matched to project complexity level
    - **Structural Engineering** – Retaining firms who performed analyses throughout life of larger and more complex towers. Utilizing internal team for less complex projects
    - **Tower Materials** – Establishing supply programs with qualified tower modification material fabricators and suppliers
    - **General Construction** – Reestablishing relationships with contractors who worked with ATC at many broadcast sites during analog to digital transition

"ATC is part of a repack team of industry professionals"

Repack Cost and Timing Risks (Update)

- **Existing Broadband Antennas:**
  - Some models indicate full bandwidth but have limitations
  - Most optimized for a certain channel range, pattern and power
  - 13 of 29 ATC broadband antennas optimized for mid to upper UHF band
  - Lower UHF channel performance in most cases is unacceptable

"Existing broadband use: Cannot be fully assessed until channel allocations are released"

Repack Cost and Timing Risks (Update)

- **New Broadband Antennas:**
  - Antenna limited to one pattern..i.e. omni, cardioid, peanut, etc.
  - Current coverage patterns vary widely in markets
    - Patterns established to avoid interference. Many analog requirements carried through analog to digital transition (i.e. >40 years old)
    - Interference requirements post repack will be completely different
    - Using existing patterns prevents stations from utilizing cost and timeline efficient broadband antenna programs

"New broadband development: Will help mitigate cost and improve construction timelines"

Repack Cost and Timing Risks (Update)

- **Tower Crews:**
  - Special tower crew skill-sets, experience and safety practices required
  - Tower heights only one measure of complexity. For example, a 300 ft. mountaintop tower may be more complicated to rig and work than some towers 1,000 ft. or greater in height
  - TIA-1019-A Standards for Installation, Alterations, and Maintenance of Antenna Supporting Structures and Antennas states: "all employees involved in construction relating to this standard shall be qualified to the **complexity** of the work"
  - There is a limited number of qualified companies and employees that have the experience, equipment and knowledge to meet this standard
  - The number of crews required has to take into account the overall amount of tower work, including the removal of antennas and lines for reverse auction winners and UHF to VHF swap-outs

"Proper allocation of crews for each project is paramount"

Repack Cost and Timing Risks (Update)

- **Tower Structural Analysis**
  - Schedule 381 forms do not reflect the tower's ability to change and support additional equipment
  - Even if a tower is passing at current rev. G, next equipment change may trigger major modifications
  - **Removing** antennas and lines from guyed towers can cause a structural overload situation - Towers with only antenna removals still require structural engineering, crews and modification resources
- **Tower Materials**
  - The number of large tower modification material fabricators and suppliers greatly depleted since analog sunset
  - Long lead time for Bridge Strand guy replacements - Can take up to 16 weeks to ship

"Structural reviews will be required for ALL equipment changes"

Summary

- ATC will be operationally prepared for Repack…..as best as possible, knowing that reverse auction and channel allocation uncertainty will have a major impact
- ATC will spend $750k to $1M of **non-reimbursable** expenses on repack resources in 2016
- ATC is budgeted to spend **reimbursable** expenses on tower upgrades and broadband antenna systems in 2016

"ATC is operationally and financially prepared for Repack"

Ask

- **ATC respectfully requests of the FCC:**
  - Approval for payment of reimbursable expenses spent **prior** to the eligible period upon completion of-post-auction station funding applications
  - Expedited CP review and approval for Licensees significantly modifying coverage to allow for broadband antenna use
  - Recognition of repack complexity impacts identified by broadcast professionals when evaluating cost and timeline
  - Development of a repack rollout plan with both wireless and broadcast inputs to relieve construction pressures that would jeopardize tower crew safety

"ATC is committed to a safe and successful Repack"

Thank You

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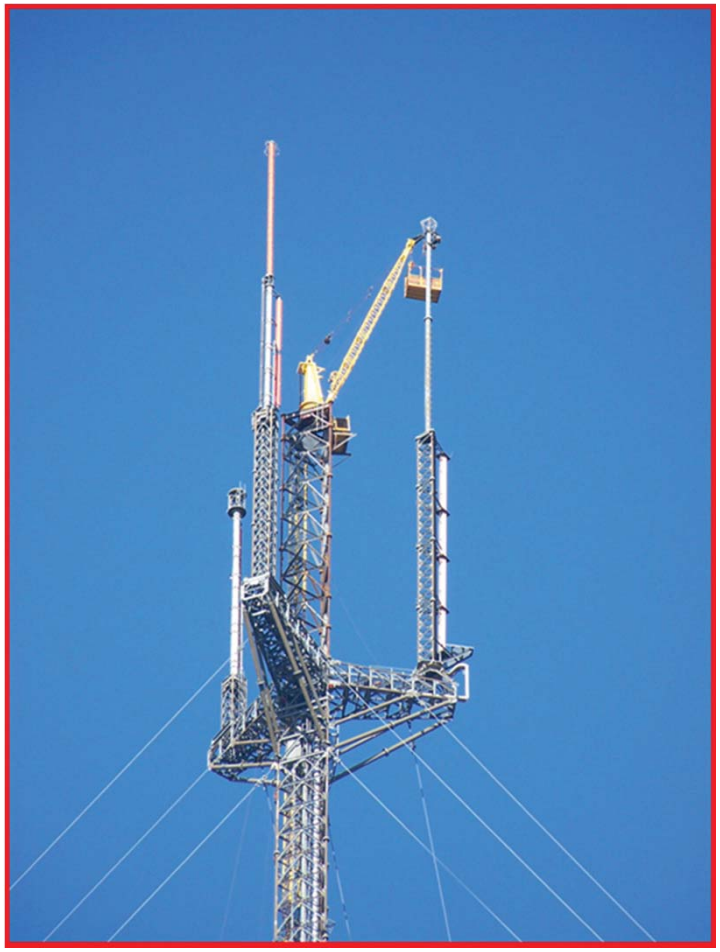
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