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JUN - 9 2016

FCC Mailroom

June 2, 2016

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

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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, MB Docket No. 15-146; Notice of Ex Parte Communication

Dear Ms. Dortch:

California Oregon Broadcasting, Inc. ("COBI") provides television service in California and Oregon using an extensive network of Low Power Television and television translator stations to relay signals to parts of its service area that would otherwise be unable to receive free, over-the-air television service. We are concerned that the Commission's plan to reserve channels in the television band for unlicensed operations after the incentive auction, putting these channels off limits for translator stations, will deprive viewers of service.

While the record of the above proceedings reflects some dispute over how extensive the impacts of the auction will be on LPTV stations and translators, there is no real question that there will be some impact and, depending on the results of the auction, the impact may be severe.

To illustrate the importance of LPTV stations and translators to current television service, we have prepared the attached document showing the LPTV and translator stations used to provide service throughout our rural and mountainous coverage areas. These stations are critical to serving our existing viewers. Moving them to new channels will be costly and disruptive, even assuming there are channels available for them.

In this context, reserving one or more channels for so-called "white spaces" operations risks needlessly forcing additional LPTV stations and TV translators off the air, depriving viewers of service they currently enjoy. The Commission should not make an already challenging situation significantly worse merely to provide free spectrum for "white spaces" operations that have yet to be deployed in meaningful numbers. Television channels that would be gifted to unlicensed users are not "vacant" at all; they are, in fact, the only potential future home of LPTV stations and translators forced to move channels by the incentive auction. LPTV stations and translators that are displaced by the auction should not be forced to yield to unlicensed services as they seek replacement channels to stay on the air and continue to serve their viewers. We urge the Commission to abandon its "vacant channel" proposal.

Respectfully Submitted,

Patricia C. Smullin
President / Owner

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CALIFORNIA OREGON BROADCASTING, INC. (FRN 0001547462)

AUCTION 1001 STATION STATUS (126 MHz - Ch. 14-29)

MASS MEDIA BUREAU LICENSES (CDBS DATABASE)

5/12/2016

CALL SIGN	Market	Band	Channel	FAC ID	Service	Class	Association	CITY OF LICENSE	COMMENTS
K14GW-D	Eugene	UHF	14	8306	LD	LPTV	KLSR	CORVALLIS, OR	
K14MQ-D	Eugene	UHF	14	8312	LD	LPTV	KEVU	COOS BAY, OR	
K19GH-D	Eugene	UHF	19	8257	DC	CLASS A	KLSR	EUGENE, ETC, OR	Eligible for reimbursement
KEVU-CD	Eugene	UHF	23	8241	DC	CLASS A		EUGENE, OR	Eligible for reimbursement
K30BN-D	Eugene	UHF	30	8246	LD	LPTV	KLSR	COOS BAY, OR	
KLSR-DT	Eugene	UHF	31	8322	DT	FULL PWR		EUGENE, OR	Eligible for reimbursement
K32FI-D	Eugene	UHF	32	8302	LD	LPTV	KLSR	YONCALLA, OR	
K38LQ-D	Eugene	UHF	38	183755	LD	LPTV	KLSR	ROSEBURG, OR	
K43DI-D	Eugene	UHF	43	8318	LD	LPTV	KLSR	CANYONVILLE, ETC, OR	
K25EN-D	Medford	UHF	25	8299	LD	LPTV	KOBI	GOLD BEACH, OR	
K32DY-D	Medford	UHF	32	8309	DC	CLASS A	KOBI	MEDFORD, OR	Eligible for reimbursement
K34KJ-D	Medford	UHF	34	8248	LD	LPTV	KOBI	CRESCENT CITY, ETC, CA	
K36BX-D	Medford	UHF	36	8307	LD	LPTV	KOBI	COOS BAY, OR	
K36IB-D	Medford	UHF	36	8236	LD	LPTV	KOTI	MIDLAND, ETC, OR	
K39CL-D	Medford	UHF	39	8296	LD	LPTV	KOBI	YONCOLLA, OR	
K41JQ-D	Medford	UHF	41	8316	LD	LPTV	KOBI	ROSEBURG, OR	
K47DV-D	Medford	UHF	47	8252	LD	LPTV	KOBI	SOUTH YREKA, CA	
K49JE-D	Medford	UHF	49	8270	LD	LPTV	KOBI	MURPHY, ETC, OR	
K50FW-D	Medford	UHF	50	8261	LD	LPTV	KOBI	GRANTS PASS, ETC, OR	
K07HS	Medford	VHF-High	7	8283	TX	XLTR	KOBI	WILLIAMS, OR	
K07JT-D	Medford	VHF-High	7	8276	LD	LPTV	KOBI	BROOKINGS, OR	
K07NR-D	Medford	VHF-High	7	8321	LD	LPTV	KOTI	LAKEVIEW, ETC, OR	
K07PZ-D	Medford	VHF-High	7	8258	LD	LPTV	KOBI	CAVE JUNCTION, ETC, OR	
K08AK-D	Medford	VHF-High	8	8277	LD	LPTV	KOBI	PORT ORFORD, ETC, OR	
K11RM	Medford	VHF-High	11	60395	TX	XLTR	KOBI	SILVER LAKE, ETC, OR	
KOTI-DT	Medford	VHF-High	13	8284	DT	FULL PWR	KOBI	KLAMATH FALLS, OR	Eligible for reimbursement
K13HU	Medford	VHF-High	13	8287	TX	XLTR	KOBI	FORT JONES, ETC, CA	
K13MI-D	Medford	VHF-High	13	13070	LD	LPTV	KOBI	SQUAW VALLEY, ETC, OR	
K04EY	Medford	VHF-Low	4	8290	TX	XLTR	KOBI	GRANTS PASS, ETC, OR	
K04HE	Medford	VHF-Low	4	8259	TX	XLTR	KOBI	YREKA, ETC, CA	
KOBI-DT	Medford	VHF-Low	5	8260	DT	FULL PWR		MEDFORD, OR	Eligible for reimbursement
K05ET-D	Medford	VHF-Low	5	8240	LD	LPTV	KOTI	LIKELY, CA	
K06NS-D	Medford	VHF-Low	6	8268	LD	LPTV	KOTI	CHILOQUIN, OR	

 UHF OUT-OF-BAND (WILL BE DISPLACED)
 UHF IN-BAND (MAY BE DISPLACED - HIGH POSSIBILITY)
 VHF (MAY BE DISPLACED)

VHF Band: Ch 2-13 (12 channels / 72 MHz)
 Current UHF Band: Ch 14-51 (37 channels / 222 MHz)
 Post Auction UHF Band: Ch 14-29 (16 channels / 96 MHz)

Statistics: 33 Licenses: 14 VHF / 19 UHF Total Reimbursable: 6 (18%)
 UHF Out-of-band, 14 (74%) Reimbursable: 2 (14%) \ Combined
 UHF In-band, 5 (26%) Reimbursable: 2 (40%) / 21%