December 15, 2009

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

Re: *National Broadband Plan*, GN Docket No. 09-51
Spectrum for Broadband, GN Docket Nos. 09-47, 09-137

Dear Ms. Dortch:

This letter is to notify you that today Larry Sidman, CEO of the Association of Public Television Stations ("APTS"), met with Edward P. Lazarus, Chief of Staff for Chairman Julius Genachowski.

Mr. Sidman discussed the unique nature of the public broadcasting system and local public television stations, and the way stations integrate a variety of delivery methods, including broadcast, Internet, and grassroots outreach, to further their goals of localism, diversity, and education. In particular, stations are increasingly aligning their video programming with their ever-growing Internet-based content, and are developing innovative online applications that can help spur demand for broadband and enhance its utility for the public.

Mr. Sidman also explained that local public television stations are making full use of their spectrum to deliver high-definition programming, numerous multicast streams, and invaluable datacasting services to enhance education, public health, and public safety at the local and national levels. Mr. Sidman's comments were consistent with the October 23, 2009, joint filing of APTS, the Corporation for Public Broadcasting (CPB), and the Public Broadcasting Service (PBS) in the above-referenced proceedings.

Mr. Sidman also had a brief conversation with Blair Levin, coordinator of the National Broadband Plan, on the same topics.

Please contact the undersigned with any questions regarding this matter.

Sincerely,

/s/ Lonna Thompson
Lonna Thompson
Senior Vice President and General Counsel

- Because of their noncommercial nature, the nation's 364 public television stations play a unique role in the media marketplace. In many cases the last locally owned and operated television stations in their areas, public television stations provide a variety of services—over the air, on the ground, and on-line—to enhance the lives of people in their communities, with a special focus on those who are underserved by commercial media.

    - Stations are not-for-profit, and are operated by local community foundations, colleges, universities, and school districts, as well as locally responsive state commissions. Each station has total control to select programming that best serves its local community. Public television stations are uniquely connected to their communities; most stations have community advisory boards, and stations' daily operations are directly funded by donations from local viewers, which constitute 25 percent of the system's funding.

    - Stations are offering a mixture of high-definition programming and multiple standard-definition streams, including dedicated government affairs channels and Spanish-language channels. Eighty-five percent of licensees are transmitting an HD stream. More than 90 percent of licensees are broadcasting more than one channel of programming, and more than 30 percent are broadcasting four or more channels.

    - Stations are utilizing datacasting to enhance public safety and public health. On the national level, our industry has teamed with the Department of Homeland Security to use our digital network to provide the Digital Emergency Alert System (DEAS).

    - Stations have engaged in local and national partnerships and outreach efforts to extend education beyond the screen. For example, through the national *Ready to Learn* initiative, public television had contributed measurably toward one of our nation's most urgent educational goals: ensuring that all children begin school ready to learn.

    - Stations are playing a unique and pioneering role in creating and delivering Internet content and applications to drive broadband demand and to advance national priorities, especially in the areas of education, health awareness, civic participation, and worker training.

- Public television programming provides a vital entry point through which viewers are introduced to stations' outreach services and on-line offerings. Thus, APTS and local public television stations have made it a priority to reach voluntary agreements with multichannel video programming distributors that provide for carriage of local stations' myriad digital offerings. In the past five years, public television has reached landmark agreements with the National Cable and Telecommunications Association (NCTA), the American Cable Association (ACA), Verizon, and, most recently, DIRECTV. APTS is currently in renewed discussions with DISH Network to ensure that its nearly 14 million customers have access to the high-quality programming offered by their local PTV stations.

- At a time when local public television stations are rolling out new digital content and applications to keep pace with ever-changing technology, stations are suffering dramatic declines in the non-federal sources of funding that constitute 85 percent of the system's operating revenue. Nearly two-thirds of stations have been forced to reduce programming and/or services. APTS and local stations are working tirelessly to obtain emergency federal funding to offset these declines and enable stations to continue to fulfill their public service mission and provide essential services to their communities. We would welcome the Commission's support in our efforts.