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January 22, 2010

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***Filed Electronically via ECFS***

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Washington, D.C. 20554

**Re: Notice of Oral and Written *Ex Parte* Communications  
GN Docket No. 09-51, MB Docket No. 05-312, RM-11574**

Dear Ms. Dortch:

An oral *ex parte* presentation was made on January 22, 2010, concerning the above-referenced proceedings, and written materials were left behind. The meetings took place at the Commission's offices in Washington, DC.

The presenter was **CTB Group, Inc.** ("CTB"), represented by:

Vernon L. Fotheringham, President  
W. Theodore Pierson, Jr., Acting Chief Legal Officer  
Peter Tannenwald and Davina S. Sashkin, Legal Counsel to CTB

The presentation was made to the **Media Bureau**, represented by:

William T. Lake, Bureau Chief  
Robert H. Ratcliffe, Deputy Bureau Chief  
Barbara Kreisman, Chief, Video Division  
John Wong, Chief, Engineering Division  
Hossein Hashemzadeh, Associate Chief, Video Division  
Kevin Harding, Video Division  
Gordon Godfrey, Policy Division

Marlene H. Dortch, Secretary  
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The presentation involved providing details of CTB's proposal to provide broadcast, conditional access television, and broadband using digital television station broadcast signals with cellularized transmission facilities, as previously described in CTB's comments, reply comments, and rulemaking petition:

<http://fjallfoss.fcc.gov/ecfs/document/view?id=7020354503> (GN Docket 09-51)  
<http://fjallfoss.fcc.gov/ecfs/document/view?id=7020354503> (GN Docket 09-51)  
<http://fjallfoss.fcc.gov/ecfs/document/view?id=7020141347> (MB Docket 05-312)

CTB noted the importance of retaining the full current spectrum allocation for television broadcasting, because the efficiency of its system is significantly enhanced by having a multi-frequency rather than a single-frequency network. CTB's technology will accommodate existing broadcast programming services, including local content; will bring broadcasters a new revenue stream to support their broadcast services; and will allow the public, through marketplace action, to decide how much spectrum capacity is devoted to legacy broadcasting and how much to new services from time to time, rather than the government trying to make the decision through the frequency allocation process. It offers a competitive broadband "pipeline" that will be more efficient than existing wireless broadband technologies, because it takes advantage of broadcast capability to allow non-duplicative distribution of frequently viewed content.

CTB also discussed how its technology fits within the existing ATSC technical standard and Distributed Transmission System rules and reviewed an earlier discussion with Media Bureau representatives regarding the importance of being to obtain experimental authorizations which allow frequent relocation and reconfiguration of transmission equipment, subject to appropriate conditions to ensure no interference to existing services.

Copies of materials delivered at the meeting can be found as attachments to a previous filing, at: <http://fjallfoss.fcc.gov/ecfs/comment/view?id=6015529666>.

Respectfully submitted

/s/

Peter Tannenwald  
Davina S. Sashkin  
*Counsel for CTB Group, Inc.*