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October 23, 2012

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

Report of *ex parte* presentations
in Docket No. 12-268

Dear Ms. Dortch:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, this is to report that Byron W. St. Clair, President of the National Translator Association ("NTA"), accompanied by undersigned NTA counsel, made an oral *ex parte* presentation concerning the above-noted proceeding to the following FCC staff members on October 19, 2012:

Gary Epstein, Chief, Incentive Auction Task Force

William Lake, Chief, Media Bureau

Alan Stillwell, Deputy Chief, Office of Engineering & Technology

Barbara Kreisman, Chief, Video Division, Media Bureau

Eric Smith, Wireless Telecommunications Bureau

During the meeting, no specific items in the rule making were discussed, and NTA made no recommendations regarding the specifics of the rule making. Dr. St. Clair pointed out, however, that there is and will continue to be a need for additional translator stations in rural areas. On behalf of the NTA, he asked the Commission to lift the freeze on the filing of applications for new television translator stations in rural areas. There is a pent-up demand for new translator stations, and although the Commission did open a new filing window for translator and low power stations, that window was closed without notice after a relatively brief period. The availability of over-the-air television service continues to be a problem in rural areas throughout the country, particularly in the west.

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The NTA also identified a problem with the mandatory September 15, 2015 digital conversion deadline that will affect the licensees of both television translators and LPTV stations. Licensees are faced with conversion costs without knowing whether their stations will have a channel after the full-service repacking is completed. NTA was unable to propose a solution, but wanted to remind the Commission that the problem lies ahead of us and to express NTA's willingness to cooperate in finding a way to eliminate the uncertainty and to preserve free over-the-air television service for residents of rural areas..

Attached are a narrative handout and two accompanying maps, which were distributed at the meeting.

Respectfully submitted,

George R. Borsari, Jr.
Counsel for the
National Translator Association

cc(via email): Gary Epstein
William Lake
Alan Stillwell
Barbara Kreisman
Eric Smith