

## DECLARATION OF DAVID FOLSOM

I, David Folsom, hereby declare under penalty of perjury that:

1. I am the Vice President and Chief Technology Officer for Raycom Media, Inc. (“Raycom”).

2. Raycom owns 43 full-power, Class A, and LPTV stations in dozens of states. These stations make frequent use of licensed wireless microphones for electronic newsgathering activities and for in-station program production and creation.

3. In January of 2010, the Commission released an order requiring wireless microphones to vacate the 700 MHz band by June 12, 2010. At that time, unlicensed Part 15 devices were not authorized to operate in the television band. Based on the assumption that its wireless microphones would continue to have assurance that they could operate in an interference-free environment, Raycom spent approximately \$161,000 in 2010 to replace its existing 700 MHz wireless microphones with other wireless microphones that operate in the post-digital transition television band. Of that expenditure, \$30,836 went towards purchasing non-700 MHz wireless microphones for use in outfitting Raycom’s multi-media journalist kits (“MMJ Kits”). Raycom’s journalists rely on MMJ kits to cover news anytime, anywhere.

4. In establishing its rules concerning the operation of unlicensed Part 15 devices in the television band, the Commission ensured that licensed wireless microphones would have several “safe harbor” channels safe from interference from unlicensed devices. In reliance on the Commission’s establishment of the safe harbor channels, Raycom has continued to make substantial investments in wireless microphones. In 2011 and 2012, Raycom spent over \$26,000 in purchasing wireless microphones for MMJ Kits. Raycom currently intends to spend over \$70,000 on wireless microphones for MMJ Kits in 2013.

Executed on March 7, 2013

  
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David Folsom