

INTERNATIONAL BROADCASTING NETWORK

Post Office Box 691111
Houston, Texas 77269-1111

April 22, 2013

BYECFS

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

Re: In the Matter of Expanding the Economic and Innovation Opportunities of
Spectrum Through Incentive Auctions, GN Docket No. 12-268

Dear Ms. Dortch:

It is astonishing that federal officials have failed to recognize that the nation's private broadcasting system and the spectrum it utilizes constitute a priceless national treasure that has long been the envy of the free world. Once that system has been effectively destroyed by spectrum auctions and "repacking," it can never be replaced.

The public airwaves, like all of our nation's other treasures, have intrinsic value that cannot be measured in monetary terms. Would federal officials auction off the Statue of Liberty, the Smithsonian, the Capitol, the Lincoln Memorial, the Library of Congress, the national park system, the great universities or any of the innumerable other national treasures? Of course not! That would be absurd in the extreme, but the federal government's spectrum auction and "repacking" scheme is an even greater absurdity.

It is essential to the preservation of democracy that free and independent broadcasters, including full power and low power alike, continue to have unrestricted and undiminished access to the public airwaves. Democracy is a treasure of infinite value, and we dare not lose it.

At best, the auction would yield only a paltry sum that would vanish within days -- but the devastating consequences would never end.

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For the foregoing reasons and those expressed in International Broadcasting Network's previous filings of January 25, March 12 and April 16, it is essential and imperative that the Commission terminate this proceeding and abandon its plans to reclaim and repurpose television spectrum.

Respectfully submitted,

A handwritten signature in black ink that reads "Paul J. Broyles". The signature is written in a cursive style with a large, prominent initial "P".

Paul J. Broyles
President