

November 8, 2013

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

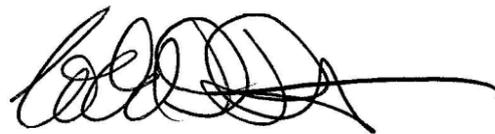
Re: Regarding Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions; Docket No. 12-268 and Public Notice, September 23, 2013, DA 13-1954

Dear Ms. Dortch:

On November 8, 2013, Jules Howard-Wright and Mike Hughes, both Principal Consultants and Co-Founders of Transmit Consultancy Ltd. ("Transmit"), Megan Delany, Dentons US LLP, and I met with Louis Peraertz, Legal Advisor to Commissioner Mignon L. Clyburn, to discuss the points set forth in the attached presentation and the comments that Transmit filed in the above-referenced proceeding. Ms. Howard-Wright and Mr. Hughes also discussed their experience with spectrum repacks in other jurisdictions, and how this experience could benefit the proposed repack in the United States.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter and the attached presentation are being filed *via* ECFS for inclusion in the public record for the above-referenced proceeding. Please contact the undersigned if you have any questions or need additional information.

Respectfully submitted,



Todd D. Daubert
Counsel for Transmit Consultancy Ltd.

cc: Louis Peraertz

Introduction

- Transmit Consultancy ("Transmit") is a team of broadcast TV experts that specializing in spectrum repacking projects.
- Transmit's experience with repacking exercises in the UK and across Europe can inform the approach in the upcoming repack to accommodate 700 MHz wireless broadband auction winners.
- Transmit favors a single-purpose organization operating within a Commission-established framework to facilitate Industry self-coordination through consolidated, central management of repacking, which would serve the public interest by:
 - Maximizing the benefit to the public by meeting the spectrum goals in a timely manner;
 - Minimizing any disruptive impact on the TV-viewing public and harm to broadcasters;
 - Reducing relocation costs through efficient management; and
 - Avoiding waste, fraud, and abuse.

Challenges associated with the US spectrum repack

1. Minimizing time to market for, and collection of auction revenues from, the auction winners
2. Ensuring broadcaster confidence in cooperative exploration of opportunities for sharing spectrum and other creative means of repacking
3. Communicating effectively with viewers to avoid confusion about availability of programming
4. Ensuring robust "like for like" networks post-repacking, including comparable coverage
5. Minimizing costly transition time in light of complex spectrum-use inter-dependencies at play
6. Managing scarce resources in and still meet the three-year transition period deadline
7. Ensuring sufficiency of \$1.75 billion TV Broadcaster Relocation Fund

Guiding principles for meeting the challenges

1. The Industry must collaborate on repack standards and plans
2. The repack must be centrally planned and geographically phased
3. A Phased repack may expedite the launch of new mobile services in critical markets
4. Planning for all contingencies is essential to successful repacking
5. Clear communication with the viewing public is essential
6. Predetermined engineering principles save costs and expedite repack implementation
7. A bespoke online resource for managing the repack is critical to success
8. Clear Principles for Cost reimbursement are critical to the success of the repack
9. Program must promote a strong future for broadcast TV

More information about Transmit Consultancy

Transmit consultants delivered the end-to-end broadcast re-engineering program for two spectrum repacks in the UK to industry and political acclaim, under budget and on-time: leading unprecedented industry collaboration. In addition, our consultants have experience of broadcast TV networks and repacking projects in Australia, Serbia and Ireland. Transmit is currently consulting broadcasters on the 3rd European repack resulting from the pending clearance (from Broadcasting) of the 700MHz band, due to be confirmed at the World Radio Conference in 2015.

Our consultants have launched and operated broadcaster shared multiplexes; set-up and managed the technical operations of both TV stations and broadcast TV platforms. Together we are experts in one of the most complex broadcast TV networks in the world. Transmit's unique expertise and experience of leading and managing significant and complex repacking projects at an industry level means that Transmit can offer unrivalled consultancy and services to help plan, co-ordinate and implement a spectrum repacking program.

Jules Howard-Wright, Principal Consultant & Co-Founder, jules@transmitconsultancy.tv

From 2006 to 2012 Jules was Broadcast Project Director at Digital UK for the Digital TV Switchover and 800MHz repacking programs. As Broadcast Project Director, she managed the technical planning, co-ordination and stakeholder management for the re-engineering of the entire UK television transmission network. During 2011 and 2012, Jules also led the technical operations and development of the UK's terrestrial platform Freeview on behalf of multiplex operators.

Jules has worked in broadcasting at an industry level for close to 15 years and has delivered technical projects (TV, internet and mobile) her whole career. Her career started at a digital communications agency (now Digitas LBi), after which Jules spent a year with a New York dot.com. As a Commercial Manager at a broadcast production house, she managed licenses delivering satellite and cable projects in the UK, USA, Israel and Australia. In 2004, Jules started her first consultancy; her first client was BSkyB where she led the team responsible for launching all broadcasters' interactive services on the Sky platform. In 2012 - for her work on UK repacking - Jules was a Women of the Year Finalist in the Cisco everywoman in Technology Awards.

Mike Hughes, Principal Consultant & Co-Founder, mike@transmitconsultancy.tv

From 2005 to 2012 he was Broadcast Director at Digital UK for the Digital TV Switchover and 800MHz repacking programs. As Broadcast Director, he led the technical planning, co-ordination and stakeholder management for the re-engineering of the entire UK television transmission network. From 1997 to May 2013, Mike managed Digital 3and4, a multiplex license holder and a joint venture between ITV and Channel 4.

He played a key role in the launch of UK's terrestrial platform Freeview (and its predecessor OnDigital), for many years he chaired the Board responsible for the technical strategy and operations of this platform. He started his career in industry relations working for the Independent Television Companies Association in the UK and then the Australian Broadcasting Commission in Sydney. He returned to the UK to Anglia Television (part of ITV) rising to Deputy CEO. In 1995, Mike formed his first broadcast consultancy; his first major client was Channel 5 where he acted as Project Co-ordination Director for launch. He is currently a Non-Executive Director for Mustard TV, the local TV license holder in the UK.

Our team of consultants

All of our consultants have played a key role and designing and delivering spectrum repack programs, launching and managing DTT networks and multiplexes. Our team consists of experts who are experienced through the end-to-end broadcast chain. Together, we have: delivered projects in the UK, Australia, the USA, Serbia, Cyprus and Ireland; chaired many Boards and industry committees, sat on Boards and committees; advised Government and regulators on behalf of broadcasters; led industry wide teams; played a role in international spectrum negotiations; managed distribution and technical operations for broadcasters; and ran multiplexes.