

INTERNATIONAL BROADCASTING NETWORK

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December 7, 2013

BY ECFS

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:

International Broadcasting Network (IBN), having previously filed comments, reply comments and additional materials in this proceeding, now wishes to briefly list a few of the major obstacles the Commission and broadcasters will face if the spectrum auction goes forward as planned. The list follows:

1. The Commission will be flooded by permit applications as a result of the repack, and it will not have the ability to process them in an expeditious manner.
2. Manufacturers of broadcast transmission equipment will be unable to meet the sudden demand. With manufacturers downsizing, moving overseas or going out of business, it's already difficult to buy transmitting antennas, connectors and other products that the repack will require.
3. There will not be enough qualified tower crews to serve all the stations that will have to install new antennas. Many tower crews have quit the business.

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4. There will not be enough qualified RF engineers to install, rebuild or retune all the transmitters that will be necessary as a result of the repack. Older RF engineers are retiring at an alarming rate, and there are very few younger people who have any interest or desire to learn the trade.
5. Rebuilding or modifying a transmission facility usually requires approval from various federal, state and local agencies, and those approvals can be difficult to obtain.
6. For stations rebuilding near the Canadian or Mexican border, foreign approval will have to be obtained. Obtaining Mexican approval can take years and often requires that illegal bribes be paid.
7. When a station is off the air for any extended period of time, as will be necessary during the repack, the station's audience is lost. It's exceedingly hard to regain a lost audience.
8. When a station is off the air for twelve consecutive months, its license is automatically forfeited.
9. Tower leases will have to be re-negotiated, and structural studies will have to be made. In many cases, new towers will have to be built.
10. The repack will be so chaotic that viewers and station owners will be incensed, and they will take out their anger on federal officials.

As IBN and others have previously shown, the Commission's proposals are bad policy, contrary to the public interest and in violation of the Constitution, various statutes and its

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own rules. For convenient reference, direct links to IBN's earlier filings are given in the attachment.

Accordingly, the Commission should terminate this proceeding and abandon its plans to reclaim and repurpose television spectrum.

Respectfully submitted,

Paul J. Broyles

Paul J. Broyles
President

Attachment

ATTACHMENT TO LETTER OF DECEMBER 7, 2013

Direct Links to IBN's Previous Filings in GN Docket No. 12-268

Comments of January 25, 2013 (6 pages)

<http://apps.fcc.gov/ecfs/document/view?id=7022112125>

Reply comments of March 12, 2013 (12 pages)

<http://apps.fcc.gov/ecfs/document/view?id=7022130036>

Letter of April 16, 2013 with one attachment (4 pages)

<http://apps.fcc.gov/ecfs/document/view?id=7022283965>

Another attachment to letter of April 16, 2013 (18 pages)

<http://apps.fcc.gov/ecfs/document/view?id=7022283966>

Letter of April 22, 2013 (2 pages)

<http://apps.fcc.gov/ecfs/document/view?id=7022290101>

Letter of April 26, 2013 (5 pages)

<http://apps.fcc.gov/ecfs/document/view?id=7022302423>

Letter of May 4, 2013 (10 pages)

<http://apps.fcc.gov/ecfs/document/view?id=7022309902>