



January 22, 2014

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

Re: *FCC Spectrum Incentive Auction NPRM (Docket No. 12-268)*

Dear Ms. Dortch:

This letter is to notify you that on January 17, 2014, Patrick Butler, President and CEO, and Lonna Thompson, Executive Vice President, Chief Operating Officer and General Counsel of the Association of Public Television Stations (APTS) met with Chairman Tom Wheeler, Renee Gregory, Legal Advisor, Gary Epstein, Chair of Incentive Auction Task Force, and Bill Lake, Chief, Media Bureau.

We discussed several issues of importance to public television regarding the incentive auction and repacking process. We addressed the plans of some public television stations to explore channel sharing opportunities in their markets. We raised the importance of the FCC conducting feasibility and optimization processes to determine the best repacking scenarios. In support of conducting feasibility testing during stages of the auction, we noted that this would allow the FCC to consider plans developed by broadcasters on a state-wide or market-wide basis. We urged the FCC to give deference to these state and market plans developed by all impacted broadcasters.

On repacking, we reaffirmed the importance of advance funding and priority given to public broadcasters. We noted the critical need to have the border issues handled prior to the repacking process begins and to finalize the issues involving OET 69. We stressed the importance of translators in the repacking. We believe that fill-in translators should be accommodated as they are key to maintaining the current coverage of stations. We also believe that translators in rural areas should be permitted to continue operations as a secondary service during and after the repacking.

Sincerely,

/s/Lonna M. Thompson

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