



February 27, 2014

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: In the Matter of 2010 Quadrennial Regulatory Review, MB Docket No. 09-182; In the Matter of Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268, Notice of *Ex Parte* Communication

Dear Ms. Dortch:

On February 25, 2014, Shani White, Bill McMartin, John Soapes, Bob Romine, Steve Sinicropi, John George, John Woodson, Harold Miller, Jane Pigg, Alex Snipe, Kirk Litton, Donita Todd, Ted Fortenberry, David Abel, Ron Hill and Bill McElveen, all members of the South Carolina Broadcasters Association ("SCBA"), as well as Jane Mago and Rick Kaplan of the National Association of Broadcasters ("NAB"), met with Commissioner Mignon Clyburn and her Chief of Staff, Adonis Hoffman, and legal intern, Stephanie Frank.

In addition to introducing the association and describing its mission, the SCBA members focused on two primary issues with the Commissioner and her staff. First, SCBA representatives stressed the importance and public interest value of TV joint sales and shared services agreements. The members noted that, even if the Commission believes there are certain bad actors, many of the agreements help increase stations' abilities to deliver high quality programming and news to their communities. They queried why the Commission would have a bright line rule attributing all such arrangements, when many acknowledge the value of a large percentage of them. The group suggested that a wise course would be to look at ownership holistically, and not just one or two individual pieces of regulation.

SCBA representatives also expressed concern about the upcoming voluntary broadcast spectrum incentive auction. The group encouraged the Commissioner to remember that, at the end of the day, the most impacted group of all will be television viewers. Wireless subscribers will have no idea if their carrier added 10 more

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megahertz to their 140 megahertz in any given market. Viewers will, however, notice immediately when they can no longer receive their favorite television stations over-the-air. The SCBA representatives also noted that of the tens of millions of over the air viewers, many are underprivileged and rely exclusively on their local broadcasters for emergency news and information as well as entertainment. If the Commission plays fast and loose with station contours, these vulnerable South Carolinians will be without their lifelines.

Some members of the group also expressed great concern about the likelihood that many South and North Carolinians will lose service if the Commission fails to protect TV translators. They noted that terrain issues make translators indispensable in the mountain regions, and if the Commission does not account for this essential service, many Americans will be negatively impacted. As South Carolinians have nothing to gain from the auction – it's an auction about urban America – the delegation asked the Commissioner and her staff to do everything in their power to ensure that local viewers are not harmed in the process.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right.

Rick Kaplan  
Executive Vice President, Strategic Planning  
National Association of Broadcasters

cc: Commissioner Clyburn  
Adonis Hoffman  
Stephanie Frank