



LPTV SPECTRUM RIGHTS COALITION
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TO: FCC Chairman, Tom Wheeler
FCC Media Bureau Chief, William Lake
FCC Spectrum Auction Task Force Chair, Gary Epstein

RE: **LAST MINUTE LPTV CONCERN, AND VERY POSITIVE FYI**

Dear Mr. Chairman, Chief Lake, and Task Force.

Our Coalition learned last week of two items, one potentially very harmful for LPTV, and the other one of the most positive pieces of news for LPTV. Considering that this is one of the last times we can provide information to the Task Force for consideration into the current NPRM, we felt the need to get this to you today. (Some of this will be redacted since it is considered confidential.)

LAST MINUTE LPTV CONCERN

One of our Coalition members, with a station directly on the border with Mexico, made a presentation last week to members of the Media and International Bureau's. They were told that LPTV would have to perform their own "international coordination" as a result of any displacements from the spectrum auction process. This would mean this small USA business would have to directly negotiate with the Mexican government for its new spectrum allocation and use. **This is a totally unacceptable additional condition put on an already highly-burdened LPTV industry, and does not meet any type of common sense test.** Just what are LPTV license fees and their Federal taxes being used for if not to receive assistance in an international negotiation placed upon them by an unfunded government mandate? Why are the auction-eligible stations being coordinated and not LPTV?

Since this seems to be a specific LPTV issue, we request that it be included in the proposed follow-on LPTV NPRM related to the spectrum auction, channel repacking, and future LPTV operations post-auction. **Our Coalition would also like clear guidance as to when and how it can submit what it thinks are needed new questions to be addressed in the LPTV NPRM.**



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VERY POSITIVE FYI

Our Coalition wanted the Commission and Task Force to know that we have been alerted by [redacted] of our members, which have [redacted]s of stations and construction permits, that they are prepared to field-test and launch [redacted]ive [redacted]

The first is [redacted] al [redacted]s, will be a collaboration of the manufacturing community and LPTV. It will be designed to b [redacted]tual [redacted]SC [redacted]st, since LPTV has an abundance of available spectrum which can be repurposed at this time. The Coalition anticipates that [redacted] will occur in the [redacted]et and we will keep the Commission informed. Since no permission is needed from the FCC to perform such activities [redacted] or [redacted], we will be able to move quickly.

The second is a new [redacted] to [redacted]s to those communities across the country which have been identified as [redacted]als. [redacted]ay, [redacted] both [redacted]ide [redacted].

What this means is that LPTV can today [redacted]es [redacted]art [redacted]like [redacted]e a [redacted]er. More informati [redacted] the [redacted]h will be coming out this summer.

Our Coalition urges the Commission to not create guard-bands which are larger than exactly what is needed to prevent interference between TV and the wireless services. Technology and American innovation have a way moving fast when a market is ready for it.

Respectfully submitted.

_____/S/_____
Mike Gravino, Director
LPTV Spectrum Rights Coalition