

April 29, 2014

Via Electronic Filing in GN Docket No.12-268

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

RE: REPLY COMMENTS; GN Docket No. 12-268 Media Bureau Seeks Comment on Widelity Report and Catalog of Potential Expenses and Estimated Costs

Below are REPLY comments in above named Docket.

J. C. Curley & Company, Inc. broadcaster consultants, have reviewed the Widelity Report, its offering of likely approaches to the commissions re-pack mission; timing, tower, transmitter and transition elements along with potential estimates of expenses and costs. We find the report detailed and a road map for large and small market stations for this phase of the DTV Transition.

However, in reviewing "Comments of Sinclair Broadcast Group, Inc." filed in this matter on page 2 and 3 of their document, they state "...broadcasters cannot do *any* advance planning without a clear and complete understanding of the repacking and transition scenarios..." and they continue "...Will there be some staggering of construction dates by region, by the type of facility change required, by population affected or some other criteria?..".

We concur with Sinclair Broadcast Group in this regard. The planning of a phased- in schedule of the re-packing transition is essential for an effective result to the goals of this project. Limited resources for suppliers (venders) and no "phase-in" schedule inhibits the ability to direct, allocate and plan the execution of those resources and would be burdensome and would not assist in the re-packing process.

The initial DTV transition from analogue to digital had 4 specific phases as below. The stations identified were to be operating on digital channels in the following order:

| Stations | Markets | Date for DTV Operations |
|------------------------|--------------------------|--------------------------------|
| Top 4 Network Stations | Top 10 Markets | May, 1999 |
| Top 4 Network Stations | Top 30 Markets | November, 1999 |
| | All Commercial Markets | May, 2002 |
| | All Non-Commercial Mkts. | May, 2003 |

Although there were adjustments to this schedule, it provided an initial businesslike approach to

not only the stations making the transition, but to the venders and suppliers of services in some orderly way.

During the past 13 years, J.C. Curley & Company, Inc. has provided targeted "DTV Medical Notification Services" to a substantial number of the full power DTV stations nationwide. This "Medical Notification" was required by the FCC as a condition of the licensee operations. This requirement was to alert all hospitals, nursing homes, and other medical facilities within a licensee coverage area that a TV facility would begin operations on an unassigned DTV Channel and may interfere with medical equipment and operations. This requirement was instituted when an early DTV station overpowered medical facilities in a major market medical complex and completely shut down operations.

Curley & Company has been the premier supplier of this Federal Communication Commission requirement. Without a known and orderly phase-in process, as in the initial transition, we would not be able to execute an effective, timely and cost effective *pre-power up service*. We, therefore, support and recommend a phased- in schedule, based upon market size, top market affiliates, and alike for a stations making this transition. The schedule can be based upon the initial phase-in digital operations on page one of this reply.

In addition, we have reviewed the estimated charges for the required notification listed in the Widely Report (page 81, heading "G. Miscellaneous Expenses, 1 DTV Medical Facility Notification"), is accurate.

Respectfully submitted,



J. Clifford Curley, President
J. C. Curley & Company, Inc.