



Federal Communications Commission  
Washington, D.C. 20554

June 30, 2014

Rick Kaplan, Executive Vice President, Strategic Planning  
National Association of Broadcasters  
1771 N Street NW  
Washington, DC 20036

Re: *Letter from Rick Kaplan, Executive Vice President, Strategic Planning, NAB, to Gary Epstein, Chair, Incentive Auction Task Force, GN Docket No. 12-268, ET Docket No. 13-26 (filed June 11, 2014)*

Dear Mr. Kaplan:

On June 2, 2014, the FCC's Office of Engineering and Technology, the International, Media, and Wireless Telecommunications Bureaus, and the Incentive Auction Task Force ("Task Force") released a Public Notice summarizing a staff analysis designed to determine the potential for new aggregate interference to television stations under the Commission's adopted approach for preserving population served based upon pairwise interference limits.<sup>1</sup> For purposes of that analysis, the Task Force staff performed 100 simulations using three different approaches to creating simulated sets of stations to be repacked. The Public Notice included an Appendix with summaries of the key findings of the simulations.

This letter is in response to NAB's letter requesting that the Task Force make available some number of the staff's 100 repacking simulations conducted as part of the Public Notice.<sup>2</sup> NAB states that access to this information will allow it to comment more meaningfully on the Public Notice.

In the interest of transparency, the Task Force staff is now releasing the underlying data for all of these simulations. For the purposes of this release, the data have been separated into the three different approaches, each of which corresponds to the metric used to rank stations for repacking for purposes of the simulations:

1. The first metric (50 simulations) is the interference-free population served by the station as determined by the *TVStudy* software.
2. The second metric (25 simulations) is calculated as a station's interference-free population served divided by the stations' "blocked channels" indicator.
3. The third metric (25 simulations) is equal to the station's 2013 Nielsen DMA ranking.

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<sup>1</sup> *Incentive Auction Task Force Releases Updated Constraint File Data Using Actual Channels and Staff Analysis Regarding Pairwise Approach to Preserving Population Served*, Public Notice, GN Docket No. 12-268, ET Docket No. 13-26, DA 14-677 (rel. June 2, 2014).

<sup>2</sup> Letter from Rick Kaplan, Executive Vice President, Strategic Planning, NAB, to Gary Epstein, Chair, Incentive Auction Task Force, GN Docket No. 12-268, ET Docket No. 13-26 at 1-2 (filed June 11, 2014).

As stated in the Public Notice, the data and information released today relate only to the repacking process, and specifically to issues that NAB and other commenters raised regarding the necessity of an aggregate interference cap when preserving coverage area and population served. Further, the metrics released today do not reflect staff or Commission assumptions about auction participation or station valuation.

The Task Force invites NAB and other interested parties to comment on the data we release here, and to conduct their own simulations using the approaches described in the Public Notice, or other approaches to analyzing the potential for new aggregate interference in the repacking process. These data files have been posted on the FCC's LEARN website, under the Repacking Section at <http://www.fcc.gov/learn>. These files have also been posted to: [http://data.fcc.gov/download/incentive-auctions/Simulation\\_Results/](http://data.fcc.gov/download/incentive-auctions/Simulation_Results/).

Sincerely,

Gary Epstein  
Chair, Incentive Auctions Task Force  
Federal Communications Commission