

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions	)	GN Docket No. 12-268
	)	
	)	
	)	
Post-Incentive Auction Transition	)	MB Docket No. 16-306
	)	

**REPLY COMMENTS OF THE  
NATIONAL ASSOCIATION OF BROADCASTERS**

The National Association of Broadcasters (NAB)<sup>1</sup> hereby replies to comments in response to the Commission’s Public Notice seeking comment on requirements for repacked television stations to report progress on their new channels following the close of the broadcast spectrum incentive auction.<sup>2</sup>

In its comments, T-Mobile proposes a number of additions and modifications to the proposed reporting form.<sup>3</sup> NAB does not object to many of these proposed modifications and believes they may help provide the Commission with additional useful information concerning the progress of the transition. However, certain of T-Mobile’s proposed modifications will impose unnecessary and redundant reporting requirements on repacked television stations

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<sup>1</sup> The National Association of Broadcasters is a nonprofit trade association that advocates on behalf of free local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

<sup>2</sup> *Incentive Auction Task Force and Media Bureau Release Transition Progress Report Form and Filing Requirements for Stations Eligible for Reimbursement from the TV Broadcast Relocation Fund and Seek Comment on the Filing of the Report by Non-Reimbursable Stations*, Public Notice, MB Docket No. 16-306, GN Docket No. 12-268, DA 17-34 (Jan. 10, 2017) (Public Notice).

<sup>3</sup> Comments of T-Mobile, GN Docket No. 12-268, MB Docket No. 16-306 (Jan. 25, 2017).

with no corresponding informational benefit to the Commission. In particular, the Commission should not require stations to publicly report the names and contact information of vendors and station personnel.

First, NAB does not agree that repacked stations should be required to identify their chosen vendors on the reporting form.<sup>4</sup> T-Mobile proposes to require repacked stations to include in their reports information regarding: the RF engineering firm a station has chosen, including the e-mail address and phone number of that firm; the structural engineering firm a station has chosen, including the e-mail address and phone number of that firm; and the manufacturer of a station's main antenna, transmitter, transmission line, mask filter or combiner and auxiliary equipment. Stations will already be required to submit this information to the Commission in cost estimates and/or receipts for reimbursable expenses. Requiring stations to submit this information in their reporting forms as well will be repetitive and unnecessary.

Beyond the question of unnecessary and duplicative reporting, NAB is concerned that T-Mobile's proposal may be subject to abuse. Armed with this information, winning forward auction bidders could contact vendors for status updates or to try to convince them (e.g., offer financial incentives) to prioritize stations these bidders have identified as instrumental for clearing spectrum for their individual use. Vendors will already be under tremendous pressure from their broadcast clients during repacking; there is no reason to subject them to inquiries from other stakeholders.

Similarly, NAB does not agree that stations should have to submit the name, phone number, e-mail address and mailing address of a "transition project manager" in a publicly

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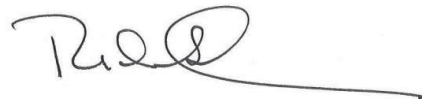
<sup>4</sup> *Id.*, Attachment at 1-2 (amended questions 3, 4, 5 and 8).

available form.<sup>5</sup> To the extent the Commission considers this information relevant to the Commission's ability to monitor and manage the transition, NAB respectfully submits that the Commission can gather this information from stations on a confidential basis. Making this information public, however, only risks subjecting station personnel to needless marketing inquiries with no corresponding benefit.

To be clear, NAB urges the Commission to proactively monitor and manage the transition, and NAB does not object to efforts by T-Mobile, or any other stakeholder, to play a productive role during the transition. However, subjecting vendors and station personnel to repetitive and harassing marketing or status inquiries is not productive. Vendors and station personnel should be focused on the task at hand: completing a massive and complex undertaking while minimizing disruption to viewers.

Respectfully submitted,

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<sup>5</sup> *Id.*, Attachment at 3 (new question 17).