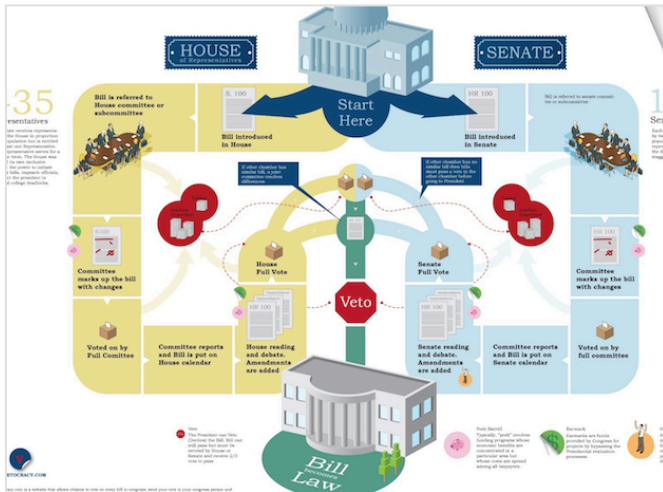




LPTV
SPECTRUM
RIGHTS
COALITION

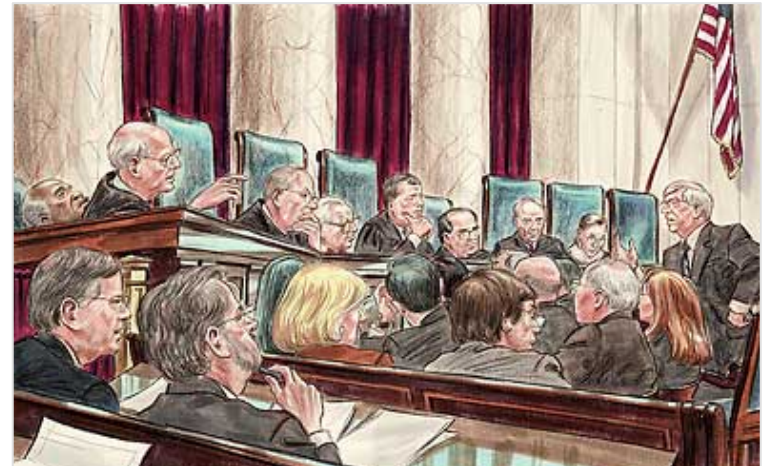
EX PARTE PRESENTATION
MAY 20, 2015

PREFERRED PROCESS



PREPARED FOR

VS.



LPTV & TV TRANSLATOR SPECTRUM USAGE RIGHTS BUY-BACK LEGISLATION

WHICH FIXES PROBLEMS IN THE
ORIGINAL INCENTIVE AUCTION
LEGISLATION AND CAPITALIZES
ON THE 1000+ DAY RULE MAKING
RESEARCH

NUMEROUS AND WELL FUNDED LPTV & TV TRANSLATOR COURT CASES

WHICH WE DO NOT WANT TO DO
BECAUSE OF OUR CLASS-A MEMBERS,
AND SINCE IT WILL NOT SOLVE THE
PROBLEMS, NOR CAPITALIZE ON THE
OPPORTUNITIES

INCENTIVE AUCTION PROBLEMS & SOLUTIONS WHICH COULD BE SOLVED IN A NEW SEPARATE IMMEDIATE LPTV SPECTRUM RIGHTS BUY-BACK AND EVENTUAL AUCTION

PROBLEM	CAUSE	SOURCE	SOLUTION
Non Auction Eligible LPTV & TV Translators	Wrong Assumptions About Secondary Status	Congressional & FCC Staff	Immediate Separate LPTV Spectrum Rights Buy-Back And Auction Within 10 Years
Select Class-A's Ruled Not Auction Eligible	FCC Discretionary Authority And Misinterpretation Of Congressional Intent	FCC Commissioners & Staff	May Be Included In LPTV Spectrum Rights Buy-Back
No LPTV & TV Translator Relocation Funding	Wrong Assumptions About Secondary Status	Congressional & FCC Staff	May Be Spent By Government Based On Future LPTV Spectrum Auction Revenues
Auction Eligible Relocation Fund Needing More Money	Inaccurate Early Estimates Which Now Need To Be Updated	Congressional & FCC Staff	May Be Spent By Government Based On Future LPTV Spectrum Auction Revenues
ATSC 3.0 and Incentive Auction Repack Is Not Coordinated	Industry Slow To Submit New Standard, FCC Unwilling To Coordinate	Industry & FCC	In This Bill Congress Directs FCC To Allow Broadcasters To Repack With 3.0
Has Not Been A New Class-A Window In Over A Decade	Wrong Interpretation Of Congressional Intent	FCC Commissioners & Staff	In This Bill Congress Directs FCC To Open New Qualifying Window Post Auction
Lack Of Adequate Low Band Unlicensed Spectrum	Post Incentive Auction There Will Not Be Any Spectrum Left For Use	LPTV Right Of Displacement	Immediate Separate LPTV Spectrum Rights Buy-Back Frees Up Spectrum For 5+ Years To Give Unlicensed Economy Time To Grow

LPTV & TV TRANSLATOR SPECTRUM USAGE RIGHTS BUY-BACK LEGISLATION

**FIXES ORIGINAL
PROBLEMS IN THE
INCENTIVE
AUCTION ACT**

- LPTV NOT ELIGIBLE
- NO LPTV RELOCATION FUNDS
- MINIMAL UNLICENSED SPECTRUM
- RELOCATION FUND TOO SMALL
- PBS WHITE AREAS

**FIXES PROBLEMS
CREATED BY
1000+ DAY
RULE MAKING
PROCESS**

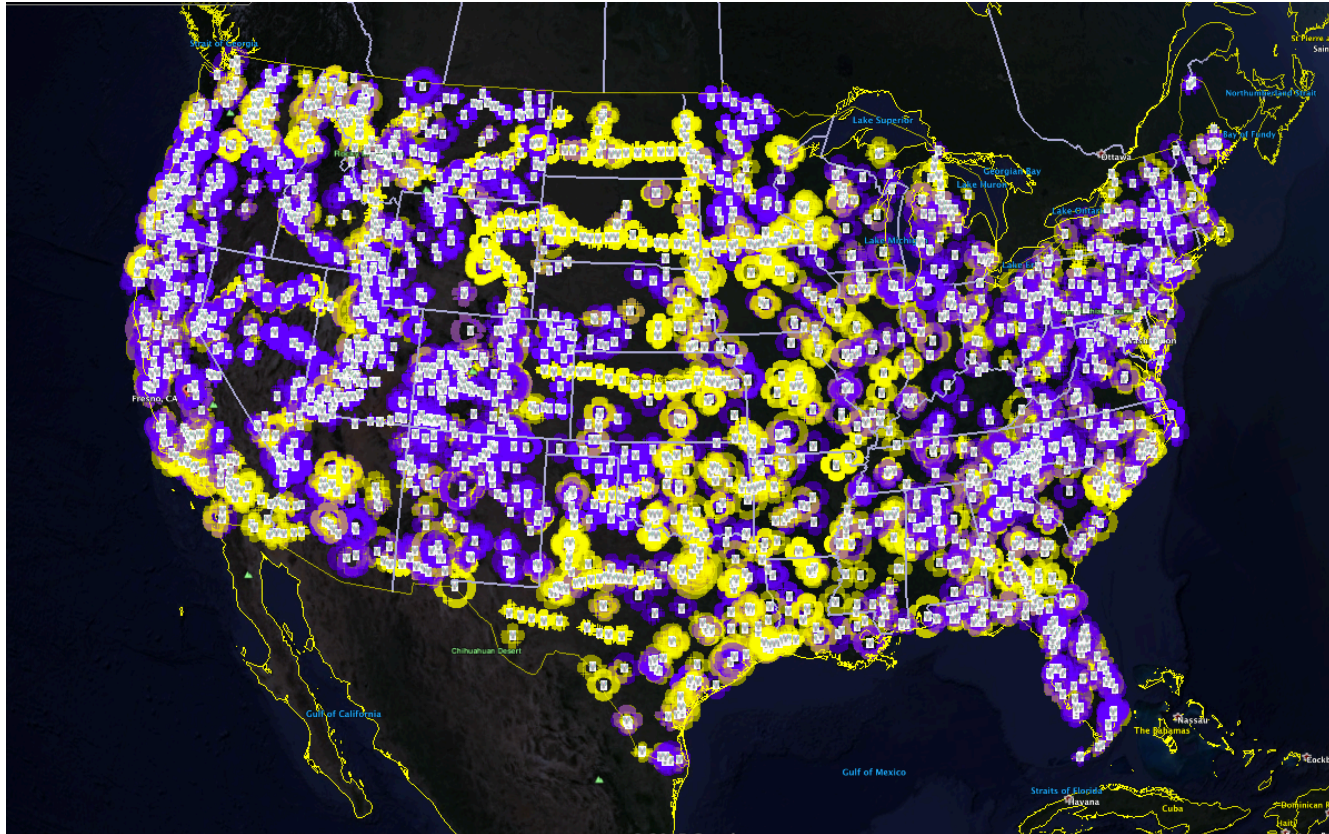
- RELOCATION FUND TOO SMALL
- LPTV NOT PROTECTED
- PBS WHITE AREAS

**FIXES PROBLEMS
NEITHER THE
FCC OR CONGRESS
HAVE BEEN
WILLING TO FIX**

- CLEARS LPTV SPECTRUM
- OPENS NEW CLASS-A WINDOW
- HUGE BOOST FOR UNLICENSED

**ANTICIPATES
FUTURE SPECTRUM
NEEDS OF THE
COUNTRY AND
INDUSTRY**

- GREATLY REDUCES LPTV SPECTRUM
- OPENS NEW CLASS-A WINDOW
- HUGE BOOST FOR UNLICENSED
- GENERATES SIGNIFICANT REVENUES



**8000+ LPTV & TV TRANSLATOR LICENSES & NEW dPERMITS
EACH WITH THE RIGHT OF DISPLACEMENT POST INCENTIVE AUCTION
REPACKING INTO ALL AVAILABLE SPECTRUM
= 1.6 BILLION COVERAGE POPS (9.6 BILLION MHZ POPS)**

******THIS MEANS NO ROOM FOR LOW-BAND UNLICENSED OR TVWS******

**THE 400+ CLASS-A'S HAVE AN ADDITIONAL 525 MILLION COVERAGE
POPS, MOSTLY TO BE SOLD IN THE INCENTIVE AUCTION**