

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

In the Matter of)	
)	
Expanding the Economic and Innovation)	GN Docket No. 12-268
Opportunities of Spectrum Through)	
Incentive Auctions)	

**MOTION FOR EXTENSION OF TIME OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

The National Association of Broadcasters (“NAB”)¹, hereby respectfully requests a limited extension of the comment deadline established by the Media Bureau for submitting comments on a draft TV Broadcaster Relocation Fund Reimbursement Form.² Comments are currently due by October 27, 2014. Pursuant to Section 1.46 of the Commission’s rules,³ NAB requests a 30-day extension of the deadline, such that comments would be due by November 26, 2014. A limited extension of time is in the public interest to allow interested parties the time necessary to address the issues on which the Bureau seeks comment.

Reimbursement of expenses for broadcasters forced to relocate to a new channel during repacking is a critical part of the incentive auction process. The mechanism by which broadcasters submit their estimated costs to the Media Bureau for approval should

¹ 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.

² *Media Bureau Seeks Comment on Draft TV Broadcasters Relocation Fund Reimbursement Form*, Public Notice, GN Docket No. 12-268, DA 14-1395 (rel. Sept. 25, 2014) (Public Notice).

³ 47 C.F.R. § 1.46(b).

be as simple and clear as possible – yet it must also be comprehensive to ensure that broadcasters are reimbursed for all expenses associated with repacking.

The actual repacking process will be extremely complex, with many moving parts. Given that one size does not fit all when it comes to broadcast stations' infrastructures, the Bureau is seeking input from a wide range of sources with varying resources.⁴ Getting input that will assist the FCC “in designing a form that facilitates the reimbursement process for all parties”⁵ will be time consuming, but it will be time well spent. It is essential that all stakeholders work with the FCC to get it right up front, so that reimbursement can run smoothly following the auction.

Moreover, the direct input of broadcast engineers, professionals with actual experience replacing or altering broadcast transmission equipment, will be critical to ensure that the reimbursement form and instructions are comprehensive, accurate and workable. Due to a number of previously scheduled conferences this month involving many key broadcast engineers it will be difficult to secure that input by the current deadline. These conferences include the Institute of Electrical and Electronic Engineers Broadcast Symposium, from October 15-17, as well as the Society of Motion Picture and Television Engineers Annual Technical Conference and Symposium from October 20-23.

NAB appreciates the Commission's urgency in moving forward to resolve open issues in the auction proceeding. In this case, an extension will not endanger the Commission's goal of conducting the auction in mid-2015, as the reimbursement forms will not be needed until after the auction is complete and stations receive their new

⁴ See Public Notice at 1 (providing “broadcasters, MVPDs, and other stakeholders” opportunity to comment).

⁵ *Id.*

channel assignments. NAB thus respectfully submits that a 30-day extension need not delay the start of the auction, and is reasonable under the circumstances to ensure that broadcasters have an opportunity to provide truly meaningful comments on the proposed form.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right from the end of the signature.

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