

May 22, 2013

The Honorable Mignon Clyburn
Acting Chair
Federal Communications Commission
445 12th St, S.W.
Washington, DC 20536

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

Dear Acting Chair Clyburn,

Water, sunlight, and soil are essential ingredients to agricultural businesses and the communities that rely on them. So too is spectrum, and the free, local news and information broadcasted on it.

For rural America, one of the most essential uses of spectrum is free, over-the-air broadcast television. On behalf of the below organizations representing rural communities and businesses in America, we ask that you maintain free and local broadcast service for all rural and mountainous viewers after the incentive auction process. This will, in particular, require the Federal Communications Commission (FCC) to study seriously the impact of its decisions on television translator service and low power television (LPTV).

In rural and mountainous areas, local broadcast television is often the only communications infrastructure that connects our communities. Over-the-air broadcast television often serves as our lifeline – connecting farmers, ranchers and growers to more populated areas. Our members rely heavily on broadcast television for local public affairs programming, news, weather and emergency information.

Whether we are facing the harsh extremes of the Great Plains, or the rapidly fluctuating climate patterns of the Rocky Mountains, up-to-the-minute local weather forecasts and emergency alerts carried by broadcast television make a significant difference to the success of our agricultural industry, which each year contributes hundreds of billions of dollars to our nation's economic output and employs more than 15 million individuals. It is also critical to the safety of the families that call our great American heartland home.

That is why it is especially concerning to us that the FCC is considering a plan, as part of its incentive auction process, that could impact rural communities and the critical broadcast television that we have come to rely upon. At risk are many of the thousands of television translators and LPTV stations that originate local farm reports or extend the reach of local broadcast signals into rural communities across America.

While we appreciate the case for identifying more spectrum for wireless broadband in the most densely-populated urban areas, we do not believe there is a "spectrum crunch" in

rural America and there certainly is no need to transfer more spectrum from broadcasters to the wireless industry in rural than urban America. The Commission must carefully consider the significant negative impact of unnecessarily reallocating more spectrum than is necessary in rural America, especially on those viewers that receive broadcast television via a translator or other low-power television stations. We are certain there is a way forward that addresses the congestion on wireless networks in urban areas that does not imperil rural America.

For this reason, we urge you to hold public hearings on the impact of its incentive auction policy choices on rural America, and in particular on the unique value of translators and LPTV broadcasts to rural America, and identify specifically the measures it will take to preserve this critical lifeline.

Sincerely,

American Agri-Women
Association of Range Consultants
National Association of Conservation Districts
National Association of State Departments of Agriculture
National Farmers Union
National Council of Farmer Cooperatives
United States Cattlemen's Association
Women Involved in Farm Economics

cc:

Commissioner Jessica Rosenworcel
Commissioner Ajit Pai