

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Application of SNR Wireless LicenseCo, LLC)	ULS File No. 0006670667
)	
Auction No. 97 – Advanced Wireless Services (AWS-3))	Report No. AUC-97
)	

To: Chief, Wireless Telecommunications Bureau

**REPLY OF THE NATIONAL ASSOCIATION OF BLACK OWNED BROADCASTERS,
INC.
TO PETITIONS TO DENY**

The National Association of Black-Owned Broadcasters, Inc. ("NABOB") urges the Commission to expeditiously grant SNR Wireless LicenseCo LLC's ("SNR") application for the licenses that it won in Auction 97. NABOB is the first and only trade association representing the interests of African American owners of radio and television stations across the United States. NABOB also has members that are currently considering whether and how to participate in the reverse portion of the FCC's upcoming broadcast incentive auction, scheduled to be held in 2016.¹ Granting SNR's license application would help to achieve three critical Commission objectives: 1) advance compliance with the Commission's statutory mandate to encourage the participation of small and minority-owned businesses in FCC spectrum auctions; 2) ensure that designated entities ("DEs") participate meaningfully in the forward auction component of the FCC's upcoming broadcast incentive auction, thus increasing competition (and revenues) in that

¹ See *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Report and Order, 29 FCC Rcd 6567 (2014).

component; and 3) further incentivize television broadcasters, including NABOB members, to participate in the reverse portion of the incentive auction due to the potential for increased reverse auction revenues resulting from vibrant forward auction competition.

SNR is the most successful African-American-controlled bidder in the history of the FCC's spectrum auctions. African-American participation in the communications industry is essential to ensuring that all Americans are represented in and benefit from telecommunications and media services. As an association of Black owned businesses in the communications industry, since its creation in 1976, NABOB has steadfastly urged the Commission to fulfill its statutory duty to disseminate spectrum licenses to a wide variety of small businesses, including minority-owned businesses,² and a grant of SNR's licenses would represent a significant achievement in fulfilling that mandate.

The Commission should also grant SNR's application to encourage DEs to participate actively and meaningfully in the upcoming broadcast incentive auction. Timely grant of SNR's licenses would demonstrate that, if a DE follows the Commission's rules, its winning license applications will be granted without undue delay. This would encourage increased participation from DEs in the upcoming broadcast incentive forward auction, with a corresponding increase in competition for spectrum licenses in the forward auction. More competition in the forward auction would increase the value of television broadcast licenses, providing television broadcasters, including NABOB members, with a greater incentive to include their spectrum in the reverse auction. The Commission would then more easily achieve its auction goals of

² 47 U.S.C. § 309(j)(3)(B) (“[T]he Commission shall include safeguards to protect the public interest in the use of the spectrum and shall seek to promote... economic opportunity and competition and ensuring that new and innovative technologies are readily accessible to the American people by avoiding excessive concentration of licenses and by disseminating licenses among a wide variety of applicants, including small businesses, rural telephone companies, and businesses owned by members of minority groups and women.”).

repurposing television broadcast spectrum for use for mobile broadband and other auction objectives, including creating a healthy revenue stream through which existing broadcasters could expand and enhance their services.

DEs, including minority-owned businesses, are a crucial resource for ensuring that the FCC's spectrum auctions reach their full revenue potential.³ Participation by DEs in Auction 97 increased that auction's net revenues by an estimated \$20 billion, resulting in a historic spectrum auction generating more than \$41 billion in net revenue.⁴ The Commission should grant SNR's license applications to make sure that more DEs participate in the broadcast incentive auction, so that it too can generate high auction revenues and a healthy revenue stream for enhancing the quality and viability of television broadcasting.

Respectfully submitted,

THE NATIONAL ASSOCIATION OF BLACK OWNED BROADCASTERS, INC.

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³ See Peter Cramton and Pacharasut Sujarittanonta, *Bidding and Prices in the AWS-3 Auction* (May 2015), attached to Letter from Rebecca Thompson, General Counsel, Competitive Carriers Association to Marlene H. Dortch, Secretary, Federal Communications Commission, AU Docket No. 14-252 *et al.* (May 20, 2015).

⁴ *Updating Part 1 Competitive Bidding Rules*, Comments in Response to Public Notice Request for Further Comment on Issues Related to Competitive Bidding Procedures, Council Tree Investors, Inc. at 26, Exhibit 4 (May 14, 2015).