

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Reallocation and Service Rules for the 698-746 MHz Spectrum Band (Television Channels 52-59))	GN Docket No. 01-74
)	
Auction of Licenses in the 698-746 MHz Band Scheduled for June 19, 2002)	DA 02-200 Report No. AUC 02-44-A (Auction No. 44)
)	

**To: Chief
Wireless Telecommunications Bureau**

REPLY COMMENTS OF ENTRAVISION COMMUNICATIONS CORPORATION

Entravision Communications Corporation (“Entravision”), the parent of the licensee of seventeen full-service television stations,¹ by its attorneys and pursuant to Section 1.415 of the Commission’s Rules, hereby submits these Reply Comments in support of the Comments filed by Paxson Communications Corporation (“Paxson”) responding to the Wireless Telecommunications Bureau’s *Public Notice* requesting comment on procedures for the handling of the lower 700 MHz auction.² In its Comments, Paxson urged the Bureau not to risk delaying the upper 700 MHz auction by linking it with the lower 700 MHz auction in any regard. Paxson argued in those Comments that any further auction delay, beyond the considerable delays that have already occurred, would frustrate considerable Commission and broadcaster efforts to clear the upper 700 MHz band and facilitate the introduction of critically needed public safety and

¹ Among the Stations licensed to Entravision’s subsidiaries are Stations located in the 700 MHz Band.

² See Auction of Licenses in the 698-746 MHz Band Scheduled for June 19, 2002: Comments Sought on Reserve Prices or Minimum Opening Bids and Other Auction Procedural Issues, Public Notice, DA 02-200, Report No. AUC-02-44-A (Auction No. 44) (rel. Jan. 23, 2002) (“*Public Notice*”).

new wireless services. Paxson also expressed concern that the Bureau's proposal to group the EAG licenses from both the upper and lower 700 MHz auctions would result in delaying the upper 700 MHz auction, given that postponement of the lower 700 MHz auction is foreseeable owing to prospective bidders' limited opportunity to plan for auction of the more heavily encumbered lower 700 MHz spectrum. Paxson finally noted that the Bureau offered no articulated benefit for such a risky and uncertain proposal.

Entravision supports the arguments made by Paxson and urges the Bureau not to take any action that would result in a delay of the upper 700 MHz auction. Entravision is aware of the commendable efforts of Paxson and other parties, organized in the Spectrum Clearing Alliance, to reach band-clearing agreements with prospective wireless entrants that would facilitate the introduction of much-needed public safety and new commercial services. The Commission's proposals for how broadcasters are to deal with the complex upper 700 MHz band-clearing process should not be undermined at this late date. Accordingly, Entravision urges the Bureau to retain the functional separation of the upper and lower 700 MHz auction and refrain from linking the two auctions in any regard. Most importantly, however, Entravision urges the Bureau not to delay commencement of the upper 700 MHz auction beyond the currently scheduled June 19,

2002 start date.

Respectfully submitted,

ENTRAVISION COMMUNICATIONS
CORPORATION

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Dated: February 13, 2002

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