

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

In the Matter of)	
)	
Service Rules for the 746-764)	WT Docket No. 99-168
and 776-794 MHz Bands)	
(Television Channels 60-69))	
)	
Auction of Licenses in the)	DA 02-260
747-762 and 777-792 MHz)	Report No. AUC 02-31-A
Bands Scheduled for June 19, 2002)	(Auction No. 31)
To: The Chief		
Wireless Telecommunications Bureau		

REPLY COMMENTS

Entravision Communications Corporation (“Entravision”) hereby submits its Reply Comments in response to the *Public Notice* requesting comment on procedures for the upper 700 MHz auction.¹ In support thereof, Entravision states as follows.

1. By these Reply Communications, Entravision wishes to evidence its support for the position taken by Paxson Communications Corporation (“Paxson”) in its submission to the Commission. Paxson urges the Commission not to risk delaying the upper 700 MHz auction by linking it with the lower 700MHz auction in any way. Paxson also correctly argues that there are no tangible benefits to linking the auctions, and that doing so creates substantial risks of further delaying the upper 700 MHz auction. Such a delay, as Paxson notes, would severely undermine the band-clearing work that the Commission and broadcasters have taken up over the last several

¹ See Auction of Licenses in the 747-762 and 777-692 MHz Bands Scheduled for June 19, 2002: Comments Sought on Adding to Auction Inventory and Further Modifying Package Bidding Procedures, *Public Notice*, DA 02-260, Report No. AUC-02-31-A (Auction No. 31) (rel. February 4, 2002) (the “Upper 700 MHz Auction Public Notice”).

years.² Paxson also notes that ongoing upper 700 MHz band-clearing efforts require the Commission's clear commitment to a pro-band clearing regulatory environment, and that any sign from the Commission that it is no longer committed to voluntary band-clearing will likely doom current efforts. Finally, Paxson argues that if the Commission delays the auction any further and forsakes the band-clearing work done by broadcasters, it will eliminate any chance that the upper 700 MHz band will be cleared for the introduction of critically needed public safety and wireless services in the foreseeable future.

2. Entravision wholeheartedly supports the positions enunciated by Paxson and opposes the proposal contained in the *Public Notice* to link the upper and lower 700 MHz auctions. Any proposal that encourages delay in the upper 700 MHz auction discourages progress in the efforts of Paxson, the Spectrum Clearing Alliance, the Commission, and others, in reaching such agreements and clearing the upper 700 MHz band. The Commission's upper 700 MHz band-clearing policies should not be changed or undermined at this late date.

3. Accordingly, Entravision urges the Commission to retain the functional separation of the upper and lower 700 MHz auctions and refrain from linking the two auctions in any regard. Most importantly, however, Entravision urges the Commission not to delay commencement of

² In fact, new efforts appear to have begun to achieve this result. In *Communications Daily*, February 26, 2002, at p. 3, the Chief of the Commission's Cable Services Bureau, Kenneth Ferree, is quoted as telling a trade association meeting that the Commission is engaged in a series of "hoedowns" to secure voluntary clearances of high-band analog channels.

the upper 700 MHz auction beyond the scheduled June 19, 2002 start date.

Respectfully submitted,

**ENTRAVISION COMMUNICATIONS
CORPORATION**

By: _____ /S/

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