

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

In the Matter of:)	
)	
Authorizing Permissive Use of the “Next)	GN Docket No. 16-142
Generation” Broadcast Television Standard)	

COMMENTS OF CP COMMUNICATIONS, LLC

1. CP Communications, LLC (“CP Communications”) hereby submits these Comments in response to the Commission’s *Further Notice of Proposed Rulemaking* (“FNPRM”) in the above-captioned proceeding, 32 FCC Rcd 9930, 82 FR 60350 (2017). CP Communications is a leading source for the rental of wireless production equipment – including wireless microphones, wireless in-ear monitors, wireless intercom and wireless cueing – to the broadcast, theatrical, live event, film, corporate, entertainment and other industries. CP Communications also sets up, manages, and supervises the operation of wireless equipment for its customers. CP Communications owns and operates wireless microphones in the 500 and 600 MHz bands and holds licenses for wireless microphones under Part 74 of the FCC’s Rules. The Company’s business is highly specialized, requiring hardware and skills that lead most high-level professional users to contract with outside vendors. Only a handful of companies offer these services, but their services are critical to the activities of their customers. They are called upon to configure and operate the most complex systems – those beyond the expertise of even broadcast customers – and are on the “front lines” when it comes to finding and efficiently using spectrum.

2. The Commission has suggested that full power and Class A stations wishing to convert to ATSC 3.0 operation be required to maintain ATSC 1.0 service on a separate channel during a transitional period. CP Communications accepts that adoption of the ATSC 3.0 standard and the dual channel occupation proposed by the Commission may be found to be in the public interest.

However, a shorter transition period of the dual channel occupation such as 30-36 months would be more in line with prior transition periods. Also a shorter transition period would have less adverse impact on companies who depend on vacant spectrum while also providing for broadcasters to transition to the ATSC 3.0 standard. A shorter transition period would likewise be beneficial to broadcasters by providing for a smaller period of time in which they are required to deliver current-generation digital television broadcast service in both the ATSC 1.0 standard and the ATSC 3.0 standard. Such a transition period would facilitate the transition to ATSC 3.0 but would not unduly occupy needed spectrum.

3. While it may be acceptable for broadcasters to use channels that are truly vacant, the Commission should also take care to not allow such operations to destroy important wireless microphone operations, much of which supports the production of the broadcasters' own content.

4. For these reasons, CP Communications urges the Commission to impose a shorter transition period if it adopts the rules relating to the transition to the ATSC 3.0 standard so to not unduly tie up valuable spectrum.

Fletcher, Heald & Hildreth, PLC

1300 N. 17th St., 11th Floor
Arlington, VA 22209-3801
Tel. 703-812-0400
Fax 703-812-0486
E-mail: tannenwald@fhhlaw.com
mcclure@fhhlaw.com

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Respectfully submitted,



Peter Tannenwald
Michelle A. McClure
Counsel for CP Communications, LLC