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WASHINGTON SQUARE, SUITE 1100 • 1050 CONNECTICUT AVENUE, N.W. • WASHINGTON, D.C. 20036-5304 • (202) 861-1500
FAX (202) 861-1783 • TELEX 2357276
WRITER'S DIRECT DIAL NUMBER (202) **861-1624**

May 19, 1992

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MAY 19 1992

Federal Communications Commission
Office of the Secretary

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

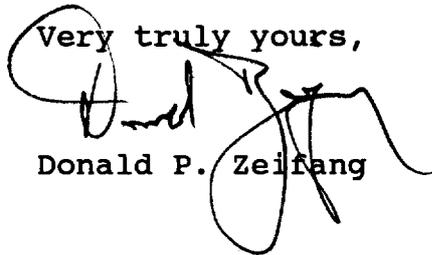
Re: ET-Docket No. 92-9

Dear Ms. Searcy:

On behalf of Scripps Howard Broadcasting Company, we transmit herewith an original and five copies of Comments in the above-referenced proceeding.

Should there be any questions, please contact the undersigned.

Very truly yours,



Donald P. Zeifang

DPZ/cp

Enclosures

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MAY 19 1992

Before the
Federal Communications Commission
Washington D.C. 20554

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Redevelopment of Spectrum to)
Encourage Innovation in the) ET Docket No. 92-9
Use of New Telecommunications)
Technologies)

COMMENTS RELATIVE TO
NOTICE OF PROPOSED RULE MAKING

These Comments were prepared by Warren Happel, Vice President Engineering Scripps Howard Broadcasting Company (SHBC), specifically in concurrence with paragraph 18, page 8, which reads in part:

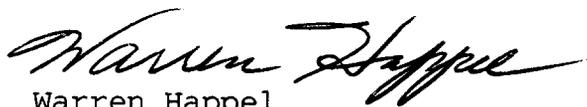
18. The study also concludes that it is not practical at this time to relocate the broadcast auxiliary and the multipoint distribution services in the 1.85-2.20 GHz range. It finds that currently there is heavy use of the ENG bands and that the forthcoming introduction of broadcast advanced television service may result in more congestion in these bands. As a result, the future requirements of the broadcast auxiliary services for operation channels could grow significantly. The higher frequency bands that are suitable for these operations do not seem to have the capacity to support the existing 2 GHz operations and new growth

SHBC is the licensee of ten television stations, seven of which depend heavily on the 1.99-2.11 GHz broadcast auxiliary band (2 GHz) for the delivery of news information for live and timely broadcasting to the public. At the present time, three of the ten SHBC stations use 2 GHz to a less extent but do depend on 2 GHz availability for sending programming from remote locations for live broadcasts and program preparation. The total investment in 2 GHz microwave equipment by SHBC approaches one million dollars.

The continued availability of the 2 GHz frequencies is necessary since there are apparently no other frequencies available near the 2 GHz band which would satisfactorily replace the technical reliability of this band.

The use of the 2 GHz frequencies by broadcasters means that virtually everyone in the United States presently benefits from the use of this frequency band. Simply stated, broadcasters use this frequency band to serve the public. Removing the 2 GHz band from broadcast auxiliary use would essentially take the frequency use from the all of the public in order to serve special interest technologies.

SHBC agrees with the Commission's support of spectrum use to encourage innovation in the use of new telecommunications technologies, and appreciates the Commission's sensitivity to those who would be affected by spectrum use shifting. SHBC also agrees with the Commission's decision to retain the use of the 1.99-2.11 GHz band for broadcast auxiliary. The 2 GHz broadcast auxiliary band not only best serves the immediate public interest but also emphasizes the need for broadcast auxiliary frequencies to support the future growth of broadcast advanced television service.



Warren Happel
Vice President Engineering
Scripps Howard Broadcasting Company
April 9, 1992