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

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

SUMMARY OF COMMENTS OF NATIONAL BROADCASTING COMPANY, INC.

National Broadcasting Company, Inc. (NBC) supports the Commission's view that it would be impracticable to reallocate the broadcast auxiliary services that now use spectrum in the 1.85-2.20 GHz range. NBC has continually opposed any PCS operation in the 2 GHz TV auxiliary band because broadcast auxiliary bands are overly congested and, in our view, further sharing would not be in the public interest. The preservation of the 2 GHz band for the use of ENG operations is of critical importance to broadcasters.

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COMMENTS OF NATIONAL BROADCASTING COMPANY, INC.

National Broadcasting Company, Inc. (NBC) operates a commercial television network that delivers a full daily schedule of programs via satellite to 209 affiliated television stations reaching 92 million homes nationwide and owns six television stations across the country. As a user of the spectrum to distribute and transmit news, entertainment, sports and other television programming throughout the United States and abroad, NBC has a vital interest in alternative spectrum use that may adversely affect the continued viability of terrestrial broadcasting. Although this proceeding raises a variety of mobile/portable, technical, economic and regulatory matters,

NBC addresses here only the use of the auxiliary television broadcast bands for PCS.

The Notice of Proposed Rulemaking concludes that it is not practicable at this time to relocate the broadcast auxiliary services that use spectrum in the 1.85-2.20 GHz range. This conclusion was based on the findings of the report "Creating Technology Bands for Emerging Telecommunications Technology," FCC/OET T592-1 (January 1992). The Notice does propose to reallocate 140 MHz from 1.85-1.99 GHz, 40 MHz from 2.11-2.15 GHz and 40 MHz from 2.16-2.2 GHz to create the 220 MHz of needed spectrum. It does not, however, propose reallocating the 1.99-2.11 GHz broadcast auxiliary band.

THE 2 GHz AUXILIARY TELEVISION BROADCAST BAND

NBC has long been a user of broadcast auxiliary stations (BAS), both in its network and station operations. We have long advocated the allocation of adequate spectrum to the BAS services to alleviate the ever-present problem of

overcrowding, which increases as more entities are declared eligible for BAS use or for use of the same spectrum.

NBC wholeheartedly agrees with the Commission's decision on the 2 GHz band. Broadcasters regard the 2 GHz band as most efficient and well-suited for ENG operations.[1] Indeed, it is the lifeline of ENG operations in the medium and large cities. Relocating to a higher frequency band would result in degraded ENG quality and speed. The resulting trauma to ENG operations, which include live news pickups and the coverage of sports events, is wholly unthinkable as television stations struggle to maintain audiences in this highly competitive marketplace. Indeed, NBC believes that additional spectrum should be allocated to

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[1] The 2 GHz band has been the predominant choice of the ENG user because of overall path performance, antenna design, transmitter power, receiver sensitivity and general reasonable electro-mechanical configurations. The RF power of the transmitter is in the order of a fraction of a watt up to several watts. The relatively high gain of the 2 GHz antenna provides a high enough ERP from a relatively low power transmitter to produce excellent transmission qualities. The 2 GHz band is not susceptible to rain, fog and atmospheric attenuation. The 2 GHz microwave systems do not require a waveguide microwave feedline system, unlike systems above 2 GHz.

relieve some of the burden placed on the broadcasters' existing ENG bands.

The question of auxiliary service needs for ATV is under consideration by the Advisory Committee on Advanced Television Service. Although a final determination of such need cannot be made until a particular system is chosen for recommendation, it is clear that no part of the presently allocated spectrum for television auxiliary use can be relinquished. Indeed, the need may exist for an expansion of the spectrum required for the ATV service. It would be ironic if HDTV services became generally available for broadcast to the public at the same moment that precious auxiliary spectrum now allocated to television broadcasting were designated for a mutually exclusive shared use.

Respectfully submitted,

Jane E. Genster

Washington Counsel
National Broadcasting Co., Inc.
1331 Pennsylvania Ave., N.W.
Suite 930 North
Washington, D.C. 20004

Louis Libin

Manager, Transmission
Standards and Technology
National Broadcasting Co., Inc.
30 Rockefeller Plaza
Room 1600W
New York, NY 10112

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