

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
International Bureau Seeks Comment on	)	IB Docket No. 16-185
Recommendations Approved by	)	WAC Document 085
World Radiocommunication Conference	)	
Advisory Committee	)	

**Comments of the National Association of Broadcasters**

The National Association of Broadcasters (NAB)<sup>1</sup> hereby submits brief comments to the Commission in the above-captioned Public Notice concerning an informational document proposing U.S. support of a WRC-23 agenda item to harmonize frequency bands for electronic news gathering (ENG)<sup>2</sup> operations regionally and/or globally. NAB notes that although a final proposal was not approved by the relevant Informal Working Group by the final meeting of the FCC's WRC-19 Advisory Committee, the underlying matter of harmonizing ENG spectrum is a timely topic and critical to the global broadcast industry.

Historically, broadcasters have utilized spectrum allocated to broadcasting for ancillary services, such as wireless microphones. As the U.S. and other administrations have reallocated UHF spectrum from broadcast to mobile uses, the intensity of broadcast use in the residual spectrum has increased forcing ancillary broadcast operations to look elsewhere. At the same time, global demand for news and entertainment content continues to increase and consumers

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<sup>1</sup> NAB is a nonprofit trade association that advocates on behalf of local radio and television stations and also broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

<sup>2</sup> For the purpose of this document, ENG represents all audio applications ancillary to broadcasting and programme making (SAB/SAP), such as electronic news gathering, electronic field production, TV outside broadcast, Program Making and Special Events (PMSE), wireless radio microphones and radio outside production and broadcast.


demand increasingly sophisticated production standards requiring a plethora of wireless microphones and similar ENG devices. Content providers moving across international boundaries are becoming frustrated that a single wireless microphone cannot be used everywhere and are increasingly having difficulty achieving the expected production values at international events, such as the Olympics. Harmonization of frequency bands and tuning ranges for wireless microphones and other ENG equipment would help administrations and the global broadcast industry plan for the future.

NAB therefore urges the FCC to support a future agenda item at the World Radiocommunication Conference (WRC-23) to work toward harmonization of frequency bands for wireless microphones and other ENG operations, as generally proposed in Document WAC/085 (11.03.19).

Respectfully submitted,

**NATIONAL ASSOCIATION OF  
BROADCASTERS**

1771 N Street, NW  
Washington, DC 20036  
(202) 429-5430

A handwritten signature in dark ink, appearing to read "Rick Kaplan", with a long horizontal flourish extending to the right.

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Rick Kaplan  
Patrick McFadden  
Robert Weller

March 18, 2019