

**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 Radio Television Digital News Association

The Radio Television Digital News Association (hereinafter, “RTDNA”)¹ submits these brief comments in response to the above-captioned Public Notice concerning an informational document proposing U.S. support of a World Radiocommunication Conference (WRC-23) agenda item to harmonize frequency bands for electronic news gathering (ENG)² operations regionally and/or globally. RTDNA firmly believes that harmonization of frequency bands and ranges for wireless microphones and other ENG equipment is of critical importance and merits inclusion on the agenda at WRC-23.

News organizations often serve as the first wave of first responders to emergencies, across this country and across borders. Whether a bombing, a mass shooting, severe weather or other threat, broadcasters and other digital media consistently and quickly provide vital information that helps listeners and viewers stay informed and, in many instances, save lives. In the U.S., government first responders, whether police, fire, or other public safety officials, often rely on the critical information disseminated by the media in the initial moments surrounding an urgent situation to determine how best to deploy their resources on the interest of public safety and security.

¹ The Radio Television Digital News Association (RTDNA) is the world's largest professional organization devoted exclusively to broadcast and digital journalism. Founded in 1946, RTDNA’s mission is to promote and protect responsible journalism.

² For the purpose of this document, ENG represents all audio applications ancillary to broadcasting and program 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.

Wireless microphones and similar ENG devices are essential to journalists' ability to fulfill this role, not only in covering emergency situations, but also in relaying information about newsworthy events, breaking news, natural disasters, or other national or international crises. Without the ability to rely on interference-free wireless microphones and related low power devices, reporters have no reliable way to disseminate information to viewers and listeners, nor the ability to communicate effectively with their producers from the field.

With increasing demand for spectrum and the reallocation of UHF spectrum to mobile uses both domestically and internationally, a discussion about how crucial ancillary broadcast operations fit into the global spectrum paradigm is both necessary and timely. Moreover, it is important to future investment and planning for news organizations operating in the U.S. and internationally to be able to use the same wireless microphone across boundaries.

For these reasons, RTDNA urges the Commission to support a future agenda item at the 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,

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/s/

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