

**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 NEW YORK PUBLIC RADIO

New York Public Radio (“NYPR”) is pleased to submit these Comments in response to the Public Notice (“PN” or “Notice”) issued by the Federal Communications Commission’s (“FCC” or “Commission”) International Bureau on March 11, 2019 in the above captioned proceeding.¹ The Notice seeks comments on the draft recommendations provided by the World Radiocommunication Conference Advisory Committee (“WAC”), as well as on draft proposals that did not reach full consensus by the membership. NYPR writes to support the draft proposal to include a future item at the World Radio Conference (“WRC”) to study alternatives and harmonize frequency bands for use in electronic news gathering (“ENG”) and program making and special events (“PMSE”) operations, as proposed in WAC Document 085 (WAC/085 - 11.03.19).

NYPR is among the country’s preeminent public radio broadcasters. It is the licensee of WNYC-FM, New York, NY, a news and talk public radio station dedicated to award-winning enterprise journalism, community engagement around critical issues, and courageous conversations convened via local and national programs. NYPR also owns and operates New York City’s only all-classical music station, WQXR-FM, Newark, NJ, as well as New Jersey

¹ See International Bureau Seeks Comment on Recommendations Approved by World Radiocommunication Conference Advisory Committee, Public Notice, IB Docket No. 16-185, DA 19-172 (rel. Mar. 11, 2019) (“PN”).

Public Radio and its four affiliated FM stations, which provide award-winning journalism and public affairs coverage of the Garden State. In addition, NYPR is home to WNYC Studios, the premier producer of critically acclaimed on-demand and broadcast audio content for national audiences, and Gothamist, a local news site it acquired in 2018. These wide-ranging operations are based at a state-of-the-art facility at 160 Varick Street, in the heart of New York's SoHo district. At street level of NYPR's Varick Street headquarters building is the Jerome L. Greene Performance Space (known as the "Greene Space"), a live broadcast studio and performance venue. NYPR reaches a passionate community of almost 26 million people monthly on-air, online and in person.

NYPR uses wireless microphones and other ENG/PMSE equipment on an extensive basis for virtually all the services it provides to its listeners and its community. It employs such applications regularly for operations in the field, whether they be newsgathering or live remote broadcasts of community and cultural events. For instance, NYPR regularly utilizes ENG to cover local emergencies, such as remote broadcasting during and in the aftermath of Hurricane Sandy. On top of that, NYPR hosts daily live music performances in its studio, as well as dozens of live performance events annually at the Greene Space. Wireless microphones and other ENG/PMSE equipment are not only necessary to ensure that the sounds of broadcast and live events are heard by audiences; it is needed to facilitate seamless communications between and among talent, producers, and crew members at remote broadcasts, in-studio and at NYPR's performance venues. In turn, the public relies heavily on NYPR's ability to use such equipment to produce news coverage, live entertainment, and other social and culture programming. In short, NYPR is uniquely situated to join the broadcast industry in urging future WRCs to explore the identification and harmonization of additional spectrum for use by ENG systems, including

wireless microphones, PMSE, electronic newsgathering and field production, and radio outside production and broadcast.

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 both timely and critical. Here in the U.S., professional users of wireless microphone spectrum have been forced to become extraordinarily efficient. Prior to 2010, users of ENG equipment could exclusively access up to 114 MHz of spectrum. The repurposing of the 600 MHz and 700 MHz bands that broadcasters have traditionally utilized for ENG has eroded the available spectrum, while demand for compelling content—which frequently entails live news coverage and real-time presentation of social and cultural events—has dramatically increased. As just one first-hand example, NYPR covers the national political conventions in their entirety every four years. In one of the recent national conventions, even after two days of live wireless system preparation, ENG systems at the convention still experienced interference that forced broadcasters to scramble to find alternate frequencies. Such venues, with a high density of systems all trying to operate under one roof with such limited frequencies, are the “acid test” for evaluating ENG spectrum sufficiency—and recent experience makes plain the challenges that already exist.

Moreover, in markets such as NYPR's home base of New York City, the sheer number of ENG users exacerbates the squeeze on spectrum. With its Manhattan-based operations, NYPR's wireless microphones and other ENG deployment compete for channels with countless numbers of other news, theater and other live event operations within short distances. For all of the above reasons, it is critical for all broadcasters—and particularly crucial to NYPR—that the FCC work at both the domestic and international level to implement solutions which allocate a sufficient amount of spectrum for wireless microphones and other broadcast ENG uses.

Conclusion

As the foregoing comments demonstrate, ENG utilization is critical to the multitude of local and national news, public affairs and cultural content that NYPR provides to the United States' largest metropolitan area and to the nation as a whole through on-air, online and person-to-person delivery. NYPR thus joins the U.S. broadcast industry in urging the FCC to support a future agenda item at WRC-23 to work toward identifying alternative spectrum and harmonizing frequency bands for wireless microphones and other ENG operations, as generally proposed in Document WAC/085 (11.03.19).

Respectfully submitted,

/s/

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