

March 18, 2019

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: IB Docket No. 16-185, *DOCUMENT WAC/085 (11.03.19)***

Dear Ms. Dortch:

The undersigned strongly support an agenda item for the 2023 World Radio Conference (WRC) to harmonize frequencies for ENG / PMSE operations, *i.e.* wireless microphones. This request goes beyond Resolution ITU-R 59-1, which does not adequately address recent and forthcoming developments. Of equal importance, cross border coordination of ENG operations is critical during life-threatening disasters.

Document WAC/085 (11.03.19) does not propose any specific allocations for ENG operations. Rather, it suggests that other administrations be encouraged to follow the U.S. lead in finding solutions when they also repurpose the 700 MHz band and likely in the future, the 600 MHz band, that are currently used for ENG.<sup>1</sup> The FCC finalized alternative bands for wireless microphones in 2017. The undersigned ask that other administrations harmonize and coordinate their work when they follow suit.

The latest revision of Resolution ITU-R 59-1 (2015) did not have the benefit of knowing the outcome of the FCC 600 MHz incentive auction. It:

*“ resolves*

1 to carry out studies regarding possible solutions for global/regional harmonization of frequency bands and tuning ranges for ENG use focused on bands **already allocated**...”  
[emphasis added]

At that time, 600 MHz and in most countries 700 MHz were already allocated for ENG. The United States has finalized alternate suitable spectrum for ENG outside these bands, including 941.5 – 960 MHz, 169 – 172 MHz, and with certain restriction 1435 – 1525 MHz.<sup>2</sup> When other administrations make similar transitions, they will inevitably open alternate spectrum bands to fulfill their ENG needs. Harmonization of these alternate bands makes logistical and economic sense.

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<sup>1</sup> Resolution ITU-59-1 (2015), footnote 2: “*For the purpose of this Resolution, ENG represents all applications ancillary to broadcasting and programme making (SAB/SAP), such as terrestrial electronic news gathering, electronic field production, TV outside broadcast, wireless radio microphones and radio outside production and broadcast.*”

<sup>2</sup> 1435 - 1525 MHz is allocated for aeronautical mobile telemetry (AMT) with a secondary allocation for wireless microphones. This is subject to stringent coordination requirements and pre-approval of events from the Aerospace and Flight Test Radio Coordinating Council (AFTRCC).

Some parties are concerned this initiative might encroach on sensitive existing services. This fear is unfounded. There is no intention of considering incompatible bands. We expect to work with concerned parties on identifying suitable bands for regional and global harmonization.

We strongly disagree with those who believe that this initiative is unnecessary or unworthy of consideration by the World Radio Conference. Reallocations of spectrum that are heavily used by ENG have been highly disruptive to the industry, at a time when demand for ENG created content is undergoing rapid growth. The core copyright industry<sup>3</sup>:

- Contributes over \$1.3 trillion dollars to the U.S. Gross Domestic Product
- Is growing at a rate that outpaces the rest of the U.S. economy
- Employs over 5 million workers who typically earn far more than the average annual compensation paid to all U.S. workers.
- Has nearly \$200 billion in export sales, outperforming many major U.S. industry sectors

As the undisputed global leader in content creation, the U.S. has a strong interest in other countries' standardizing on frequency bands.

Furthermore, ENG at times is the front end in broadcasting critical life-saving information in the event of disasters, underscoring the importance of cross border coordination. The intention of Resolution ITU-R 59-1 makes it clear that harmonization is desired and benefits all administrations, industry, and operators. Recent dynamic developments plus inevitable changes in the 700 MHz and 600 MHz bands underscore the need for international coordination. This initiative has broad support within the broadcast industry and a wide variety of other content creators.

We strongly urge the Commission to support a future WRC 2023 agenda item for harmonization of ENG operations. Thank you.

Respectfully submitted,

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<sup>3</sup> Copyright Industries in the U.S. Economy – The 2018 Report, Siwek,  
<https://pmcdeadline2.files.wordpress.com/2018/12/copyright-industry-report-wm.pdf>

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