

In the Matter of)
)
Proposals for a New FM Radio)
Broadcast Class C4 and to Modify) MB Docket No. 18-184
the Requirements for Designating)
Short-Spaced Assignments)

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. (“CDE”) and is in response to the NOI released by the Commission on June 5, 2018. CDE and its predecessors have practiced before the Federal Communications Commission (“FCC”) for over 75 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and perform professional consulting engineering services to the communications industry.

This inquiry seeks comment on the proposal to create a Class C4 facility. The comments by this firm are as follows.

It is unclear how the coordination procedure will be achieved with adjacent administrations. It is recommended that the FCC provide guidance in this area. For example, for many years pre-coordination could be sought on FM facilities that were within the required

coordination distance before formal filing an application with the FCC. Recently there seems to have been a change in FCC policy as it appears that no such pre-coordination opportunity now exists. It is our understanding that the application must be filed before the FCC will begin the coordination issue. As the FCC is familiar with coordination, it is possible that a potential C4 station will be delayed and could potentially affect neighboring domestic assignments.

Therefore, further guidance is welcomed.

Existing FM Translator Service

As noted by the FCC, the question to handle recently established FM translator stations, particularly by an AM station is a very difficult issue. It is recognized that FM translator service is by its very nature secondary to a full-service station. This is not unlike the requirement for TV translator channel change mandated by the recent incentive auction. Therefore, it is urged that the FCC consider developing an interim procedure for existing FM translators that have the potential to be displaced to a new Class C4 station filing.

Other


The FCC addressed many other difficult issues requesting industry input. Those other issues have not gone unnoticed. This firm anticipates it will make every effort to address some of these other technical issues in the reply comments.

Cohen, Dippell and Everist, P.C.

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Respectfully Submitted,



Donald G. Everist

Date: August 13, 2018