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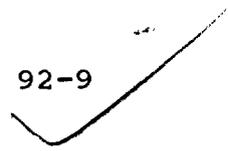
Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

DEC 11 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Redevelopment of Spectrum to)
Encourage Innovation in the)
Use of New Telecommunications)
Technologies)

ET Docket No. 92-9
RM-7981
RM-8004



**COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

By its Further Notice of Proposed Rule Making ("Further Notice") in the above captioned proceeding,^{1/} the FCC proposes spectrum reallocation to facilitate the emergence of new telecommunications technologies. In these comments, the National Association of Broadcasters ("NAB")^{2/} supports the Commission's decision not to include the 1.99-2.11 GHz broadcast auxiliary band among those frequencies proposed to accommodate new telecommunications technologies. Additionally, NAB cautions the Commission to be wary of those spectrum allocation models which pose the greatest potential threat for "fringe interference" with broadcast auxiliary and other licensed video operations on the 1.99-2.11 GHz band.

^{1/} See, Further Notice of Proposed Rule Making in ET Docket 92-9, 7 FCC Rcd 6100 (1992).

^{2/} NAB is a nonprofit, incorporated association of radio and television broadcast stations and networks. NAB serves and represents America's radio and television stations and all the major networks.

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NAB applauds the Commission's recognition of the vital public interest advanced by preserving these frequencies for electronic news gathering ("ENG") and other video transmissions by broadcast television stations and other licensed providers of video services. As clearly set forth in NAB's Comments in the related personal communications services proceeding ("PCS Rule Making")^{3/} and in comments and reply comments filed earlier in the instant rulemaking proceeding,^{4/} today's information age public demands up-to-the-minute, on-location coverage of newsworthy events. Modern mobile news gathering operations, which are only feasible within the 1.99-2.11 GHz band, are vital to this timely dissemination of information to the public.

NAB also reiterates its arguments against spectrum sharing and spectrum reallocation of ENG operations, as enumerated in NAB's pleadings filed in this and the related PCS Rule Making.^{5/} Current spectrum sharing and spectrum reallocation models do not account for the numerous, precarious variables, unique to mobile ENG operations. Such models present a real threat of interference with vital ENG operations and,

^{3/} See, Comments of NAB in Gen. Docket No. 90-314 and ET Docket No. 92-100 at 2, filed November 9, 1992.

^{4/} See Joint Comments of NAB, the Radio-Television News Directors Association, the Cable-Satellite Public Affairs Network, the Association for Maximum Service Television, Inc. and Turner Broadcasting System, Inc. ("Joint Parties") in ET Docket No. 92-9, filed June 8, 1992; see also Joint Parties' Joint Reply Comments in ET Docket No. 92-9, filed July 8, 1992.

^{5/} See id.; see also Comments of NAB in Gen. Docket No. 90-314 and ET Docket No. 92-100, supra note 3, at 2-6.

threaten considerable harm to the substantial public benefit these operations serve.

Finally, NAB recommends that the Commission's evaluation of the various spectrum redevelopment models include an assessment of potential fringe interference with the 1.99-2.11 GHz broadcast auxiliary band. NAB encourages the Commission to steer clear of spectrum allocation models which pose the greatest threat of congestion and proximity to the fringe frequencies of the 1.99-2.11 GHz band. Unnecessary fringe interference would prove to be a costly impediment to the realization of the Commission's goal of efficient spectrum utilization.

CONCLUSION

NAB commends the Commission's decision in the Further Notice not to include the 1.99-2.11 GHz broadcast auxiliary spectrum among those frequencies designated for reallocation to accommodate the emergence of new telecommunications technologies. Successful accommodation of these technologies does not depend upon the redevelopment of the 1.99-2.11 GHz band. Therefore, NAB respectfully requests that the Commission maintain its current

exclusion of the 1.99-2.11 Ghz spectrum from those frequencies to be redeveloped for new telecommunications technologies.

Respectfully submitted

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