

Capital Cities/ABC, Inc. 77 West 66 Street New York NY 10023 (212) 456 7593

Roger Goodspeed
Assistant General Attorney
Law & Regulation

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July 15, 1993

HAND DELIVER

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Dear Mr. Caton:

On behalf of Capital Cities/ABC, Inc., transmitted herewith for filing with the Commission are an original and five copies of its Reply Comments in ET Docket No. 93-59.

If there are any questions in connection with the foregoing, please contact the undersigned.

Very truly yours,


Roger Goodspeed

RG/ak
Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of)
)
Amendment of Section 2.106) ET Docket No. 93-59
of the Commission's Rules to) RM-8092
Allocate Spectrum for Wind)
Profiler Radar Systems)

REPLY COMMENTS OF CAPITAL CITIES/ABC, INC.

Roger Goodspeed
Assistant General Attorney,
Law & Regulation

Capital Cities/ABC, Inc.
77 West 66th Street
New York, New York 10023

Counsel for Capital Cities/ABC, Inc.

Kenneth J. Brown
Manager, Allocations and Licensing
Broadcast Operations & Engineering

July 15, 1993

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To: The Commission

REPLY COMMENTS OF CAPITAL CITIES/ABC, INC.

Capital Cities/ABC, Inc. ("Capital Cities/ABC") submits these Reply Comments in response to the initial comments filed on the Commission's Notice of Proposed Rulemaking and Notice of Inquiry ("Notice"), released April 1, 1993, concerning its proposal to allocate 449 MHz for wind profiler radar systems ("wind profilers").

Capital Cities/ABC supports the comments of the Society of Broadcast Engineers, Incorporated ("SBE") filed June 15, 1993 (the "SBE Comments"), and its view that the proposed allocation would cause unacceptable interference with the Broadcast Auxiliary Remote Pickup ("RPU") band at 450-451 MHz. Capital Cities/ABC is the owner and operator of eight television stations, seventeen radio stations and the ABC Television and Radio Networks, among other mass media and mass-media-related enterprises, and uses the RPU band extensively around the United States in connection with those operations.

As the SBE Comments point out, the study by the National Telecommunications and Information Administration ("NTIA") -- upon which the frequency allocation proposed in the Notice is based -- contains apparent errors or inconsistencies concerning wind profiler bandwidth and operating power. See SBE Comments, paragraphs 4(B), 4(E), 8, 10. Capital Cities/ABC shares the SBE's view that those errors or inconsistencies cast doubt on NTIA's conclusions concerning the distances needed to isolate RPU band users from interference caused by wind profilers (operating at 449 MHz). See SBE Comments, paragraph 9.

Since the SBE Comments were filed, Capital Cities/ABC engineer Kenneth Brown was able to meet through

calculations, we continue to believe the distance separation needed between wind profilers and RPU users (5 kilometers for 450 MHz ground RPUs and 2 kilometers for 451 MHz ground RPUs)

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atmosphere (near 30,000 feet) for use in weather prediction. Mr. Brown was told that wind profilers are not intended to determine wind shear conditions such as can be experienced at ground level during aircraft takeoff and landing. Low level wind shear is measured by terminal doppler radars at airports, which are quite different devices and use different operating frequencies. The NOAA engineers indicated that the operation of wind profilers would tend to be disturbed by jet aircraft turbulence during takeoff and landing and by the wind-driven movement ("tower sway") of any tall towers (such as are used in broadcast operations) near the profilers. That information alleviates our concern that wind profilers would customarily be used near major airports, and thus near large metropolitan areas with many RPU band users.

However, now that the wind profiler demonstration project is complete, wind profiler installations can be expected to be made soon by various parties around the country. It cannot be assumed that all parties will exercise good judgement in locating these profilers, and some may unwittingly place them in locations threatening damaging interference to broadcasters. Further, broadcasters may inadvertently place an RPU facility or a new tall tower near a profiler.

These potential interference problems could be avoided by specifying a minimum distance separation of 135 kilometers between RPU base stations and wind profilers and

requiring prior coordination between wind profiler operators and broadcasters through the agency of the local SBE coordinator. The Commission is regularly informed of the identities of these people, who tend to be familiar with their local environments and could be of assistance to all involved parties.

It is of critical importance to broadcasters and other RPU users, such as Capital Cities/ABC, that the RPU bands suffer no further encroachment or interference. Accordingly, we join the SBE in urging that the Commission not adopt the proposed rule allocating 449 MHz to wind profilers. At the very least, the Commission should not adopt the rule without adding the geographical operating limits for wind profilers that provide the foundation for the proposed frequency allocation.

Respectfully submitted,

By:


Roger Goodspeed
Assistant General Attorney,
Law & Regulation

Capital Cities/ABC, Inc.
77 West 66th Street
New York, New York 10023

Counsel for Capital Cities/ABC, Inc.

Kenneth J. Brown
Manager, Allocations and Licensing
Broadcast Operations & Engineering

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