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January 20, 1995

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

RE: MM Docket No. 94-130

Dear Mr. Caton:

Transmitted herewith, on behalf of Harris Corporation - Harris/Allied Broadcast Division, are an original and four copies of its Comments in the above-captioned rulemaking proceeding.

Should any questions arise concerning this matter, please contact this office.

Very truly yours,

FLETCHER, HEALD & HILDRETH, P.L.C.



Frank R. Jazzo
Counsel for
Harris Corporation -
Harris/Allied Broadcast Division

FRJ/rhw
Enclosure

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List A B C D E

Harris Allied Comment on NFMN docket No. 94-130
Permitting Unattended Operation and Rules Update

Page 4.

12. Phase monitoring equipment would indicate if parameters were at variance. If the parameters were within the required license values, no harmful interference should occur. A simple method of determining if all switches in a pattern change are made can be found in phasor controllers which use a transmitter interlock circuit which would prevent the transmitter from coming on, if all RF switches were not properly seated.

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15. Harris suggests that tower lighting verifications be permitted by automatic means rather than a duty operator or other appointed individual.

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36. Frequency is a very stable parameter. Failure of the frequency determining device normally results in automatic shutdown of the transmitter through direct (Automatic Frequency Control interlocks) or indirect (amplifier DC overloads, high reflected power etc.) means. Very few broadcast transmitter designs allow for external control of the carrier frequency. For the reasons given, Harris suggests that ATS systems not be required to monitor and adjust carrier frequency.

73.57(b)(2)

73.158 (c)

73.1350(b)(2)(d)(2)

73.1400 (4)(b)

Harris thinks that the time allowed for action is unreasonably short. The importance of not causing interference is understood. Realistically, more time than 3 minutes may be required to verify that a transmission problem actually does exist. We suggest a 1 hour grace period to provide time to verify and/or correct a problem prior to powering down or shutting off.

73.1570

Given the high quality of audio processing equipment and transmitter equipment available today, the rule about maintaining 85% modulation, may be unnecessary given the wide selection of alternative entertainment available to potential listeners. Broadcasters already have every incentive to maintain good modulation levels.

Appendix B

Harris supports the waiver of a licensed transmitter duty operator.

I hereby certify that the foregoing is true and correct comments of Harris Corporation, Harris Allied Broadcast Products Division.



Daryl Buechting
FM Radio Product Line Manager
For the Group