

- (a) Whether to require broadcasters to resolve interference complaints to telephones;
- (b) Whether to extend the one-year period during which a licensee must take full responsibility to resolve blanketing interference complaints;
- (c) Whether to delete so-called "high gain" antennas from the list of devices that are excluded from interference protection; and
- (d) Whether to require broadcasters to maintain a log of specific interference complaints, including steps taken to resolve them and the date each complaint was finally resolved.

Saga herein comments on the above-referenced proposed rule amendments.

Resolution of Interference to Telephones

The Commission is considering whether to require broadcasters to provide interference protection to telephones, both hard-wired and cordless. Currently, it has been the Commission's policy to exclude such devices. See NPRM at ¶22. Saga opposes the inclusion of telephones, either hard-wired or wireless, in the Commission's list of those devices that are to be afforded full protection from blanketing interference. It has been the experience of Saga's technical staff that the real cause of telephone interference is inferior manufacturing techniques and/or faulty premises wiring. The Commission recognizes in its NPRM that telephone "manufacturers apparently can design telephones to be interference free." Therefore, telephone interference should continue to be resolved by other parties (telephone companies, manufacturers, etc.) and should not be the responsibility of broadcasters who have no control over how a telephone product is manufactured. This is especially true given the continued deregulation of the telecommunications industry which may result in the manufacture of additional inferior telephone equipment. Including telephones in the list of

protected devices would unfairly place an onerous burden upon broadcasters to resolve interference to substandard devices.

Extension of the One-Year Interference Period

Saga also opposes the Commission's proposal to extend the one-year period during which broadcasters must take full responsibility for blanketing interference complaints. Extending the one-year period would create additional unfair financial hardship on all broadcasters. There must be a "bright line" point at which a broadcaster can safely conclude that there are no problems with interference or that all problems have been resolved. Requiring the public to come forward with interference complaints within one year of the initiation of new or modified service affords more than sufficient time. Extending that period any further will pose further difficulties for broadcasters who attempt to resolve interference complaints. This is especially true with residents in transient residential areas (such as apartment and townhouse type dwellings) who frequently move in and out. It is difficult to maintain a steady line of communication with complainants to resolve interference complaints. The current one-year period is a fair balancing of the rights of the public to interference free broadcast service with the rights of broadcasters.

Deletion of "High Gain" Antennas from the Excluded Devices List

Section 73.318(b) of the Commission's Rules excludes certain devices from the requirements of interference protection. Listed in the Rule are: "malfunctioning or mistuned receivers, improperly installed antenna systems, or the use of high gain antennas or antenna booster amplifiers." Saga opposes the proposal to delete "high gain antennas" from §73.318(b) of the Rules. The effect of such a change would be to require broadcasters to

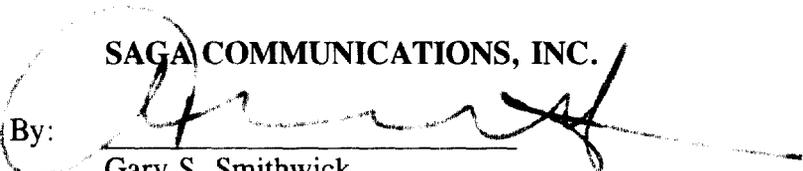
§73.318(b) of the Rules. The effect of such a change would be to require broadcasters to provide interference protection to persons using such devices. As is evident from the fact that high gain antennas were included in the list of excluded devices in §73.318(b), broadcasters should not be responsible for resolving interference to these types of devices. It would be unfair to permit individuals with faulty amplification devices to burden broadcasters with the financial responsibility to repair or replace such expensive devices. Such devices should continue to be excluded from the requirements of interference resolution.

Requirement to Maintain Interference Log

The Commission has sought comments as to whether broadcasters should be required to maintain a log which would include, among other things, specific information as to each interference complaint, steps taken to resolve the complaint, and the date the complaint was resolved. While maintaining an "interference log" may be a good method of tracking interference complaints, Saga believes that such a procedure should be voluntary, and not mandatory so as to not impose additional costly paperwork burdens upon broadcasters.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Patricia A. Neil, a secretary in the law firm of Smithwick, & Belendiuk, P.C., certify that on this 25th day of June, 1996, copies of the foregoing were hand delivered to the following:

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