Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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OFFICE OF SECRETARY

In the Matter of Amendment of Parts 73 of the Commission's Rules to More Effectively Resolve Broadcast Blanketing Interference, Including Interference to Consumer Electronics and Other Communications Devices	)))))))	MM Docket No. 96-62

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REPLY COMMENTS OF SPRINT CORPORATION

Sprint local telephone operating companies ("Sprint") respectfully submit its reply comments in the above-captioned proceeding pursuant to the Notice of Proposed Rulemaking ("NPRM"), released April 26, 1996. In the NPRM the Commission requests comments on its proposed amendments to facilitate resolution of broadcast blanketing interference problems. Sprint's reply comments are directed at the Commission's question on telephone interference.[1]

Sprint sells and rents telephone terminals in addition to providing local telephone services for nearly 7 million access lines in 19 states. As a provider of telephone terminals, Sprint supports the Commission's previous decisions to exclude resolution of telephone interference from broadcaster's blanketing rules. Sprint agrees with several of the commenters[2] that equipment manufacturers are in the best position to be primarily responsible for blanketing interference problems that occur in terminal devices. An equipment manufacturer is the most qualified and knowledgeable to make terminals that effectively suppress interference. They

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[1]NPRM, ¶22-24.
[2]NAB Comments, pp. 4-5; Saga Comments, pp. 2-3; Thomas G. Osenkowsky Comments, pg. 5; Lucent Comments.

are also in the best position to provide information to consumers or end users on how to resolve interference problems either through the use of internal or external filters or where additional information and advice may be obtained. Part 68-registered EMI-reducing filters are currently available on the market and may reduce interference when the path is conducted. In its comments, the National Association of Broadcasters ("NAB") suggests that there may be cases when interference is so severe that a custom, non-registered filter is required, which is why network providers should be co-responsible with equipment manufacturers. However, interference problems usually occur when a terminal improperly acts as a radio receiver and demodulates an rf signal. In this case, an internal filter is much more effective at preventing interference than an external filter because of signal pick-up on the line between the filter and the demodulating component. A network provider should not have to assume co-responsibility when an internal filter designed with the original equipment's specifications by the equipment manufacturer has potential to eliminate the need for external custom filters.

Within some limitations, Sprint supports the NAB's suggestion that network operators have some responsibility, in addition to equipment manufacturers to prevent interference problems. If the broadcast station and the telephone network are operating properly (meaning the network is not transmitting demodulated audio towards any terminal) and if a network provider is also a terminal equipment vendor, Sprint agrees that the network provider has an interest in voluntarily assisting in resolution of interference issues and complaints. Sprint is a terminal equipment vendor and, as a representative of the manufacturer, willingly assists in interference resolution activities to benefit its customers.

However, network providers should not have co-responsibility, especially if they do not provide the terminal equipment receiving the interference, or if interference is caused by direct radiation alone. In instances of interference solely through direct radiation, which is responsible for a portion of interference from FM broadcast stations, network providers cannot change or affect the interference by changing the network. Network providers should have no financial responsibilities for this type of interference.

In conclusion, Sprint requests that the Commission maintain its current rules for broadcasters that excludes resolution of telephone interference, and review ways for equipment manufacturers to be held responsible for creating interference-free terminal equipment. However, a network provider should only have limited responsibilities when they are providing equipment.

Respectfully submitted,

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July 25, 1996

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 25th day of July, 1996, sent via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Reply Comments of Sprint Corporation" in the Matter of Amendments of Parts 73 of the Commission's Rules to More Effectively Resolve Broadcast Blanketing Interference, Including Interference to Consumer Electronics and Other Communications Devices, MM Docket No. 96-62, filed this date with the Acting Secretary. Federal Communications Commission, to the persons on the attached service list.

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