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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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MAY 14 1997

In the Matter of)
)
Amendment of Parts 21 and 74 To Enhance) RM-9060
The Ability of Multipoint Distribution Service)
And Instructional Fixed Television Fixed)
Service Licensees To Engage In Fixed)
Two-Way Transmissions)

To: The Commission

COMMENTS

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EXECUTIVE SUMMARY

The parties listed on Appendix A to the Petition for Rulemaking that commenced this proceeding (collectively, the "Petitioners") submit these comments in response to the Commission's March 31, 1997 *Public Notice* soliciting comment on the Petition and on "how the Commission can amend its rules to permit even broader flexibility than suggested by Petitioners." The Petitioners believe that there are several rule changes in addition to those proposed in the Petition that the Commission can implement at this juncture in order to further enhance the ability of MDS and Instructional Television Fixed Service ITFS licensees to productively employ their spectrum.

Specifically, the Petitioners are proposing that the Commission's rules be amended to achieve three objectives. First, the Petitioners are proposing that the Commission afford MDS and ITFS licensees the same flexibility to alternate between the provision of common carrier and non-common carrier services as has recently been afforded LMDS licensees. It is proposed that the Commission implement a system under which MDS and ITFS licensees can secure authorization once to provide common carrier and non-common carrier services, and then would be permitted to alternate among such services without seeking additional Commission authorization.

Second, it is proposed that the Commission adopt rules governing radio frequency ("RF") emissions for MDS/ITFS return path transmissions that are similar to those adopted recently for LMDS licensees. As the Commission has done with respect to LMDS, it is proposed that the Commission require that MDS and ITFS licensees are required to attach a label to subscriber transceiver or transverter antennas that (1) provides adequate notice regarding potential radio frequency safety hazards, *e.g.*, information regarding the safe minimum separation distance required between users and transceiver antennas; and (2) references the applicable FCC radio frequency emission guidelines contained in FCC OST Bulletin 65, 2d Edition.

Finally, the Petitioners are proposing that the Commission afford the licensees of the 125 kHz channels in the 2.5 GHz band additional flexibility in connection with the use of their channels for two-way communications. It is proposed that these 125 kHz channels be made available for point-to-multipoint transmissions, and generally be licensed and afforded interference protection in accordance with the rules governing 6 MHz channels.

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To: The Commission

COMMENTS

The parties listed on Appendix A to the Petition for Rulemaking (the "Petition") that commenced this proceeding (collectively, the "Petitioners"),^{1/} by their attorneys, hereby submit their initial comments in response to the Commission's March 31, 1997 *Public Notice* soliciting comment on the Petition and on "how the Commission can amend its rules to permit even broader flexibility than suggested by Petitioners."^{2/} As will be discussed in more

^{1/} The Petitioners represent a rare grouping of participants in the wireless cable industry and the educational community, including The Wireless Cable Association International, Inc. ("WCA"), most major wireless cable system operators, many MDS and ITFS licensees, MDS Basic Trading Area ("BTA") authorization holders, wireless cable engineering consultants, and manufacturers of wireless cable transmission and reception equipment.

^{2/} "Pleading Cycle Established For Comments On Petition For Rulemaking To Amend Parts 21 And 74 Of The Commission's Rules To Enhance The Ability Of Multipoint Distribution Service And Instructional Television Fixed Service Licensees To Engage In Fixed Two-Way Transmissions," *Public Notice*, RM-9060, DA 97-637 (rel. March 31, 1997). The Petitioners note that WebCel Communications, Inc. and the Interactive Video Data Trade Association, Inc. on April 30, 1997 filed pleadings opposing grant of the Petition. The Petitioners intend to fully respond to these self-serving efforts at precluding competition when they file their reply comments on May 29, 1997.

detail below, the Petitioners believe that there are several rule changes in addition to those proposed in the Petition that the Commission can implement at this juncture in order to further enhance the ability of Multipoint Distribution Service ("MDS") and Instructional Television Fixed Service ("ITFS") licensees to productively employ their spectrum.

I. SUMMARY OF PROPOSAL.

Specifically, the Petitioners are proposing that the Commission's rules be amended to achieve three objectives. First, the Petitioners are proposing that the Commission afford MDS and ITFS licensees the same flexibility to alternate between the provision of common carrier and non-common carrier services as has recently been afforded Local Multipoint Distribution Service ("LMDS") licensees.^{3/} Second, it is proposed that the Commission adopt rules governing radio frequency ("RF") emissions for MDS/ITFS return path transmissions that are similar to those adopted recently for LMDS licensees. And, third, the Petitioners are proposing that the Commission afford the licensees of the 125 kHz response path channels in the 2.5 GHz band additional flexibility in connection with the use of their channels for two-way communications.

^{3/} *Rulemaking to Amend Parts 1, 2, 21, and 25 Of the Commission's Rules to Redesignate the 27.5-29.5 GHz Frequency Band, To Reallocate the 29.5-30.0 GHz Frequency Band, To Establish Rules and Policies for the Local Multipoint Distribution Service and for Fixed Satellite Services*, FCC 97-82, CC Docket No. 92-197, (rel. Mar. 13, 1997)[hereinafter cited as "*LMDS Second Report & Order*"].

II. DISCUSSION.

A. The Commission Should Provide MDS And ITFS Licensees Flexibility To Readily Alternate Among Common Carrier And Non-Common Carrier Services.

As the Petition demonstrates, although MDS channels have recently been devoted primarily to the non-common carrier transmission of video programming on behalf of wireless cable operators, the Commission has always permitted MDS channels to be employed for the provision of "any kind of communications service."^{4/} Accordingly, as the Commission recently acknowledged when it adopted new service rules for LMDS, the Commission has long afforded each MDS licensee the flexibility to provide service as either a common carrier or a non-common carrier.^{5/} However, the Commission has required each MDS licensee to choose to operate each channel solely as a common carrier or as a non-common carrier, and has not established procedures by which a given channel can be employed for both common carrier and non-common carrier offerings.^{6/} Similarly, the Commission has also afforded ITFS licensees who choose to lease excess capacity on their

^{4/} See Petition, at 21-23, quoting 47 C.F.R. §21.903(b).

^{5/} See *LMDS Second Report and Order*, at ¶¶ 201, 206, 223 citing *Revisions to Part 21 of the Commission's Rules Regarding the Multipoint Distribution Service*, 2 FCC Rcd 4251, 4251-53 (1987)[hereinafter cited as "*MDS Status Election Order*"].

^{6/} See *MDS Status Election Order*, 2 FCC Rcd at 4252 ("an MDS licensee may elect a different status for each particular channel for which it is licensed.").

main channels or subsidiary channels the flexibility to decide whether or not to operate as a common carrier, although the rules governing such election are not entirely clear.^{7/}

The current regulatory scheme regarding status election for MDS and ITFS licensees is likely to prove problematic as the Commission amends its rules to provide those licensees the technical flexibility to offer an increasingly wide array of services. In the *LMDS Second Report & Order*, which was released just the day prior to the filing of the Petition, the Commission stated that:

We also decline to require an applicant to choose between either common carrier or non-common carrier status in providing services under the broad license to be issued. We find it is inconsistent with the broad service definition and the flexible operations we adopt for LMDS to require the licensee to forgo one category of service for the other category. Licensees may well provide services that include elements of both common carrier and non-common carrier services. Instead, we will permit LMDS to be licensed to allow both common carrier and non-common carrier services in a single license. Thus, under our framework an applicant may request both common carrier and non-common carrier status in the same application, which will result in the issuance of both authorizations in a single license. The licensee will be able to provide all LMDS services anywhere within its licensed area at any time, consistent with the statutory and regulatory requirements that are imposed on the respective operations. It is the licensee's obligation to maintain the various operations in compliance with the requirements.^{8/}

The Petitioners believe that a similar approach is appropriate for MDS and ITFS licensees.

^{7/} *Amendment of Parts 2, 21, 74 and 94 of the Commission's Rules and Regulations in regard to frequency allocation to the Instructional Television Fixed Service, the Multipoint Distribution Service, and the Private Operational Fixed Microwave Service*, 94 F.C.C.2d 1203, 1250-55 (1983).

^{8/} *LMDS Second Report & Order*, at ¶ 225.

Accordingly, the Petitioners propose that the Commission allow an MDS or ITFS licensee to freely offer common carrier and/or non-common carrier services on any given channel without specific approval, once the licensee has secured authorization from the Commission to offer both types of services. An applicant for a new facility would specify whether it proposes to take advantage of such flexibility. In the case of an existing MDS common carrier, the licensee should be required to comply with the procedures set forth in Section 21.910 of the Commission's Rules the first time it proposes to engage in non-common carrier offerings in whole or in part. In the case of an existing MDS non-common carriers or ITFS licensee (none of whom are known to have secured common carrier status), they should be required merely to file applications proposing to convert to common carrier status or to provide both common carrier and non-common carrier service offerings.^{2/} The Petitioners propose that such applications be processed under the expedited provisions of Section 21.42 (in the case of an MDS station) or Section 74.911(a)(2) (in the case of an ITFS station). In this manner, licensees who desire to provide a mixture of common carrier and non-common carrier services will be required to secure an appropriate authorization just once, and the process for securing that authorization will be only minimally intrusive.

^{2/} Of course, no licensee should be permitted to avoid its obligations under an existing, enforceable non-common carrier contract by converting to common carrier status.

B. The Commission Should Adopt RF Emission Rules For MDS/ITFS Return Paths Similar To Those Adopted For LMDS.

Although the Commission has long provided 125 kHz response channels for MDS and ITFS licensees,^{10/} the Commission's Rules are unclear as to the radio frequency ("RF") emissions requirements associated with MDS and ITFS return path equipment (which are generally called "transceivers" or "transverters"). To provide certainty to those MDS and ITFS licensees that choose to employ either those 125 kHz channels or their 6 MHz channels for return paths, the Petitioners propose that the Commission establish clear RF emissions requirements for return path equipment.

In its recent *LMDS Second Report & Order*, the Commission adopted RF emissions rules relating to LMDS transmissions. The Commission ruled that "because of the technical similarities between LMDS and MDS, we are requiring LMDS licensees to follow the RF radiation guidelines and procedures that apply to MDS systems."^{11/} Accordingly, the Commission amended Section 1.1307 of the Rules to provide that, like MDS and ITFS stations, LMDS stations are required to perform routine environmental evaluations if: (a) the transmitting antenna is not rooftop mounted, its height above ground is less than 10 meters and the station's total power is greater than 1,640 Watts EIRP; or (b) if the facility is roof mounted and the power is greater than 1,640 Watts EIRP.^{12/}

^{10/} See Petition, at 24-25.

^{11/} *LMDS Second Report & Order*, at ¶ 292.

^{12/} See *id.* at ¶ 293.

The Commission recognized, however, that "subscriber transceiver antennas present a unique situation."^{13/} The Commission determined that:

Since the Commission has not specifically addressed RF emissions guidelines for this kind of equipment, we believe that requiring licensees to provide user and installation information, and to label subscriber antennas properly, provides adequate notice regarding the potential safety hazards of LMDS subscriber transceivers. We will therefore require LMDS licensees to attach labels to every antenna, in a conspicuous fashion. Such labels should include reference to the Commission guidelines that apply. In addition, we expect LMDS licensees to include a full explanation of the labels that appear on their antennas, as well as reference to the applicable Commission guidelines in the instruction manuals and other information accompanying their subscriber transceivers. For example, this information should include advice as to minimum separation distances required between users and radiating antennas to meet the Commission's exposure guidelines. While we will require LMDS licensees to attach labels and provide users with notice of radiation hazards, we will not mandate the specific language to be used. However, we will require use of the ANSI-specified warning symbol for RF exposure.^{14/}

To effectuate that discussion, the Commission further amended Section 1.1307 of the rules to provide that:

LMDS licensees are required to attach a label to subscriber transceiver antennas that (1) provides adequate notice regarding potential radio frequency safety hazards, *e.g.*, information regarding the safe minimum separation distance required between users and transceiver antennas; and (2) references the applicable FCC radio frequency emission guidelines contained in FCC OST Bulletin 65, 2d Edition.

47 C.F.R. §1.1307. The Petitioners propose that, given the similarity between LMDS and MDS/ITFS return path operations, similar language should be added to the provisions of

^{13/} *Id.* at ¶ 294.

^{14/} *Id.* at ¶ 295.

Section 1.1307 that address the MDS and ITFS services. Specific proposed rule changes are set forth in Appendix A.

C. The Rules Governing The 125 kHz Response Channels Should Be Revised To Provide Greater Flexibility.

As is discussed in detail in the Petition, Parts 21 and 74 of the Commission's Rules currently provide for a group of 125 kHz wide MDS/ITFS channels in the spectrum from 2686 MHz to 2690 MHz that are available to the licensees of all ITFS channels and to the licensees of MDS channels E1, E2, F1 and F2.^{15/} The Petition proposes that the rules governing those 125 kHz channels be substantially revised to provide, among other things, procedures for the licensing of those channels, technical rules governing the operation of those channels, and the provision of interference protection to operations on those channels.

Although the Petition focused on the use of the 125 kHz channels for communications originating from subscribers' premises, the Petitioners believe that the Commission should also revise its rules to permit the use of those channels for communications to subscribers. As new applications for the ITFS and MDS spectrum using digital technologies are developed, it is becoming apparent that there is a need to employ some portion of the spectrum for transmitting downstream control signals over side channels that require less than a full 6 MHz channel. Use of the 2686-2690 MHz band 125 kHz channels for such applications is attractive, for it permits preservation of the primary 6 MHz channels for transmissions that require greater bandwidth. Thus, the Petitioners propose that the

^{15/} See, e.g. Petition, at 24-25.

Commission permit the use of the 125 kHz channels for point-to-multipoint transmissions, and that such facilities be licensed and afforded interference protection in the same manner as other point-to-multipoint MDS and ITFS facilities.

Two examples of applications that can benefit from downstream use of the 125 kHz channels are control over digital set top decoders and control over two-way communication systems. In the case of digital set top decoders, systems are often designed to employ a separate channel to send control information (such as premium channel and pay-per-view authorizations, downloading electronic program guide data, conditional access authorizations, and software applications) to subscriber units.^{16/} In such systems, the set top box contains a second, fixed-tuned receiver that acquires the control data no matter what channel the primary receiver is tuned to receive. This avoids the need to duplicate the control data on all of the other channels and permits the set top unit to continue to receive control data even when its primary receiver is tuned to a channel that is not part of the system.

Similarly, a side channel is necessary for some types of two-way communications systems to control the timing of transmissions from different stations in a network, to send power control instructions, or to assign channels to individual stations. By using the 125 kHz channels for these functions, it is possible to minimize the range of frequencies that side channel receivers must be able to tune, thereby reducing the cost of equipment. This

^{16/} Side channels of this type often use QPSK or other low-density modulation and provide data rates between 1.5 and 2 Mb/s.

approach also leaves the 6 MHz channels intact, thereby permitting them to be used most efficiently.

In order to permit the use of 125 kHz channels for point-to-multipoint use, the Commission should amend its current rules as necessary to make clear that its current MDS and ITFS point-to-multipoint application and interference protection rules will control. To illustrate, assume that the current licensee of the A Group ITFS channels desires to secure a new license for use of the 125 kHz channels associated with the A Group ITFS channels for point-to-multipoint transmissions. In order to secure an authorization for such use, the licensee would submit an application and demonstrate compliance with the interference protection obligations imposed under Section 74.903. Such proposed station would then be entitled to interference protection at registered ITFS receive sites and within a 35 mile radius protected service area (if the station is leased for commercial operations).^{17/}

^{17/} To further provide flexibility to the licensee of the 125 kHz channels, the Petitioners propose that the Commission remove the provisions of Sections 21.909(a) and 74.939(d) that limit any given 125 kHz channel to use in conjunction with the use of the 6 MHz channel with which that 125 kHz channel is associated under the table in current Section §74.939(d). Aside from eliminating an artificial restriction on usage, adoption of this proposal will permit disaggregation of the 6 MHz and the 125 kHz channel with which it is currently associated. It is quite likely that the applications described above will require channels wider than 125 kHz in order to provide the data rates that are necessary along with the required simplicity and robustness that, in turn, come only from using low modulation densities such as those of BPSK and QPSK. However, because the response channels associated with a given group of 6 MHz channels are not contiguous, aggregation is virtually impossible. Consider the case, for example, where three operators in a market have licenses or leases on two or three groups each – A and B; C and D; E, F and G, for sake of argument. Through aggregation, the largest channels that these operators could put together under the current rules, despite their willingness to cooperate with one another, is four channels of 250 kHz bandwidth each for the A/B and C/D operators and two channels of 375 kHz bandwidth

Finally, the Petitioners propose that the Commission develop a more specific method for identifying each of the individual 125 kHz channels. At present, each is simply identified by reference to the primary channel with which it is associated -- thus, for example, the response channel at 2686.5625 MHz is identified as the "E1 response channel."^{18/} The Petitioners are proposing a new system, set forth in the amendment to current Section 74.939(d) annexed as Appendix A, which provides each channel with an independent designation. Because the Petitioners contemplate that the 125 kHz channels will be employed for more than just response channels, the new designation system affords a "shorthand" method for identifying a 125 kHz channel without reference to the specific frequencies employed and without risk of confusion with a 6 MHz channel.

III. CONCLUSION.

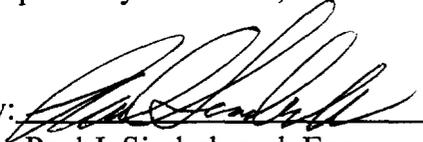
The Commission is to be applauded for its prompt action in releasing a *Public Notice* soliciting comment on the proposals advanced in the Petition. Adoption of those proposals, along with the additional proposals set forth above, will provide MDS and ITFS licensees the flexibility that they need in order to meet the emerging communications needs of the commercial and educational marketplaces. Therefore, the Petitioners urge the Commission

each and two of 125 kHz bandwidth for the E/F/G operator. If the operators were allowed to cooperate by interchanging 125 kHz channels among themselves through assignments or contractual arrangements, they could achieve the maximums possible of two channels having 875 kHz bandwidth each and two having 500 kHz each, with two of 125 kHz each left over.

^{18/} See 47 C.F.R. §74.939(d).

to quickly adopt a notice of proposed rulemaking proposing the rule revisions advanced by the Petitioners and to place that proceeding on a "fast track" so as to assure that the public benefits associated with the proposed new rules are not unduly delayed.

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May 14, 1997

PROPOSED ADDITIONAL RULE CHANGES AND EXPLANATORY NOTES

1. Section 1.1307 is amended by adding the following language directly following the reference to MDS stations:

MDS licensees are required to attach a label to subscriber transceiver or transverter antennas that (1) provides adequate notice regarding potential radio frequency safety hazards, *e.g.*, information regarding the safe minimum separation distance required between users and transceiver antennas; and (2) references the applicable FCC radio frequency emission guidelines contained in FCC OST Bulletin 65, 2d Edition.

EXPLANATORY NOTE — The proposed revision is intended to establish RF emissions restrictions on MDS transceiver units akin to those established for similar LMDS devices.

2. Section 1.1307 is amended by adding the following language directly following the reference to Part 74 stations:

ITFS licensees are required to attach a label to subscriber transceiver or transverter antennas that (1) provides adequate notice regarding potential radio frequency safety hazards, *e.g.*, information regarding the safe minimum separation distance required between users and transceiver antennas; and (2) references the applicable FCC radio frequency emission guidelines contained in FCC OST Bulletin 65, 2d Edition.

EXPLANATORY NOTE — The proposed revision is intended to establish RF emissions restrictions on ITFS transceiver units akin to those established for similar LMDS devices.

3. Sections 21.901(a), (b) and (d) are revised as follows:

(a) Frequencies in the bands 2150-2162 MHz, 2596-2644 MHz, 2650-2656 MHz, 2662-2668 MHz, ~~and 2674-2680 MHz and 2686-2690 MHz~~ are available for assignment to fixed stations in this service. Frequencies in the band 2150-2160 MHz are shared with nonbroadcast omnidirectional radio systems licensed under other parts of the Commission's Rules, and frequencies in the band 2160-2162 MHz are shared with directional radio systems authorized in other common carrier services. Frequencies in the 2596-2644 MHz band are shared with Instructional Television Fixed Service stations licensed under Part 74 of the Commission's Rules. The

h) of this chapter are grandfathered for fixed stations in this band and are shared with Instructional Television Fixed Service Stations licensed under Part 74 of the Commission's Rules; the existing response channels E3, E4, F3 and F4 H4g, H4c, H4v and H4d listed in §74.939(d h) of this chapter are grandfathered and licensed under Part 21 of the Commission's Rules.

(b) Applicants may be assigned a channel(s) according to one of the following frequency plans:

- (1) At 2150-2156 MHz (designated as Channel 1), or
- (2) At 2156-2162 MHz (designated as Channel 2), or
- (3) At 2156-2160 MHz (designated as Channel 2A), or
- (4) At 2596-2602 MHz, 2608-2614 MHz, 2620-2626 MHz, and 2632-2638 MHz (designated as Channels E1, E2, E3 and E4, respectively, with the four channels to be designated the E-group channels), and response Channels E1 and E2 H4e and H4m listed in §74.939(d h),¹ or
- (5) At 2602-2608 MHz, 2614-2620 MHz, 2626-2632 MHz and 2638-2644 MHz (designated as Channels F1, F2, F3 and F4, respectively, with the four channels to be designated the F-group channels) and response Channels F1 and F2 H4f and H4n, listed in §74.939(d h),¹ or
- (6) At 2650-2656 MHz, 2662-2668 MHz and 2674-2680 MHz (designated as Channels H1, H2 and H3, respectively, with the three channels to be designated the H-group channels).¹

* * *

(d) Frequencies in the band 2596-2644 MHz and associated response 125 kHz channels listed in Section 74.939(h) will be assigned only in accordance with the following conditions.

* * *

NOTES:

1 No response 125 kHz channels are provided for Channels E3, E4, F3, F4, H1, H2 and H3.

EXPLANATORY NOTE — *The proposed revisions are designed to make clear that the 125 kHz channels at 2686-2690 MHz can be used for point-to-multipoint transmissions, as well as for use as response channels, and to conform the identification of such channels to the proposed changes to Section 74.939(d), which will be redesignated as subsection (h) under the revisions proposed in the Petition.*

4. Sections 74.902(c) and (d)(1) are amended to read as follows:

(c) Channels 2596-2602, 2602-2608, 2608-2614, 2614-2620, 2620-2626, 2626-2632, 2632-2638, and 2638-2644 MHz and the corresponding response 125 kHz channels listed in §74.939(d) are shared with the Multipoint Distribution Service. No new Instructional Television Fixed Service applications for these channels filed after May 25, 1983 will be accepted. In those areas where Multipoint Distribution Service use of these channels is allowed pursuant to §21.902, Instructional Television Fixed Service users of these channels will continue to be afforded protection from harmful co-channel and adjacent channel interference from Multipoint Distribution Service stations.

(d)(1) A licensee is limited to the assignment of no more than four 6 MHz channels for use in a single area of operation, all of which should be selected from the same Group listed in paragraph (a) of this section. An area of operation is defined as the area 20 miles or less from the ITFS transmitter. Applicants shall not apply for more 6 MHz channels than they intend to construct within a reasonable time, simply for the purpose of reserving additional channels. The number of 6 MHz channels authorized to an applicant will be based on the demonstration of need for the number of 6 MHz channels requested. The Commission will take into consideration such factors as the amount of use of any currently assigned channels and the amount of proposed use of each channel requested, the amount of, and justification for, any repetition in the schedules, and the overall demand and availability of ITFS channels in the community. For those applicant organizations formed for the purpose of serving accredited institutional or governmental organizations, evaluation of the need will only consider service to those specified receive sites which submitted supporting documentation pursuant to §74.932(a)(4).

EXPLANATORY NOTE — *The proposed rule changes are intended to make clear both that the 125 kHz channels are no longer only for use as response channels, and that the Commission's restriction on the number of ITFS channels normally available to a licensee only governs the 6 MHz channels, and does not include the 125 kHz channels.*

5. Section 74.939(d), which is redesignated as subsection (h) by virtue of the amendments proposed in Appendix B to the Petition, is amended to read as follows:

~~(d) FFS response stations may operate on either all or part of a 6 MHz channel assigned a licensee, on any 125 kHz channel assigned a licensee, or on adjacent frequencies authorized to multiple licensees where such stations are operated jointly. All FFS response stations communicating with a single instructional television fixed station shall operate on the same frequency. The specified frequency which may be used is determined by the channel assigned to the instructional television fixed station with which it is communicating, as shown in the following table. Operation on other FFS response channels is prohibited. The 125 kHz channels shall be made available in the first instance to the licensees of MDS and FFS stations in accordance with the following table. The specified 125 kHz frequency channel may be subdivided to provide a distinct operating frequency for each of more than one response station or combined with adjacent channels.~~

Frequency (MHz)	Primary Channel Designation	125 kHz Channel Designation
2686.0625	A1	H4a
2686.1875	B1	H4b
2686.3125	C1	H4c
2686.4375	D1	H4d
2686.5625	E1	H4e
2686.6875	F1	H4f
2686.8125	G1	H4g
2686.9375	H1	H4h
2687.0625	A2	H4i
2687.1875	B2	H4j
2687.3125	C2	H4k
2687.4375	D2	H4l
2687.5625	E2	H4m
2687.6875	F2	H4n
2687.8125	G2	H4o
2687.9375	H2	H4p
2688.0625	A3	H4q
2688.1875	B3	H4r
2688.3125	C3	H4s
2688.4375	D3	H4t
2688.5625	E3	H4u
2688.6875	F3	H4v
2688.8125	G3	H4w
2688.9375	H3	H4x
2689.0625	A4	H4y
2689.1875	B4	H4z
2689.3125	C4	H4aa

2689.4375	D4	H4bb
2689.5625	E4	H4cc
2689.6875	F4	H4dd
2689.8125	G4	H4ee

EXPLANATORY NOTE — The newly-proposed revisions are designed to provide designations for each of the 125 kHz channels and to provide for the use of the channels for point-to-multipoint transmissions.