

Cohen, Dippell and Everist, P.C.

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Section 73.207 73.211,)
73.215 and 73.3573 of the Commission's) RM-11727
Rules Related to Minimum Distance)
Separation Between Stations, Station)
Classes Power and Antenna Height)
Requirements, Contour Protection for)
Short Spaced FM Assignment and)
Processing FM Broadcast Station Application)

Reply Comments
on Behalf of
COHEN, DIPPELL AND EVERIST, P.C.

The following reply comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") and is in response to the Public Notice released by the Federal Communications Commission on July 18, 2014. CDE and its predecessors have practiced before the Federal Communications Commission ("FCC") for over 75 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and performed professional consulting engineering services to the communication industry.

The undersigned is licensed as a Professional Engineer in the District of Columbia and has been in continuous employment with this firm or its predecessors for over fifty (50) years.

CDE believes that where full spacing permits, it is appropriate to consider Class C4 facility in Zone 2 which would allow a Class A station to operate with a significant increase in effective radiated power.

However, as the FM band becomes mature, the FCC should consider placing conditions on all future non-directional construction permits for any class station similar to the following:

Suggested Construction Permit Condition

If non-directional antenna is proposed to be side-mounted for any class station, a special condition should be imposed indicating if theoretical and/or measured studies are conducted by an antenna manufacturer or consultant/technical representative that the family of FM patterns be retained by the station and antenna manufacturer or consultant/technical representative for a period of 5 years. A written justification at the time of the license application submission by the permittee why the filed pattern was selected as meeting the most non-directional circular pattern in both polarizations.

In this manner if the question arises, the FCC can request the pattern information from the antenna manufacturer or from that station. This will provide the FCC immediate information when situation arises and thereby conserve valuable FCC resources.

Respectfully Submitted,



Donald G. Everist
District of Columbia
Professional Engineer No. 5714

Date: October 3, 2014