Cohen, Dippell and Everist, P.C.

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

In the Matter of	)	
	)	
Expanding the Economic and Innovation	)	
Opportunities of Spectrum Through	)	GN Docket No. 12-268
Incentive Auctions	)	
	)	
Office of Engineering and Technology	)	
Releases and Seeks Comment on Updated	)	ET Docket No. 13-26
OET-69 Software	)	
	)	
Office of Engineering and Technology Seeks	)	
to Supplement the Incentive Auction	)	ET Docket No. 14-14
Proceeding Record Regarding Potential	)	
Interference Between Broadcast Television	)	
and Wireless Services	)	

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

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") and is in response to the Second Report and Order and Further Notice of Proposed Rulemaking released by the Commission on October 17, 2014. CDE and its predecessors have practiced before the Federal Communications Commission ("FCC") for over 70 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 communications 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.

The FCC has elaborated what it anticipates on potential interference between television operations and wireless operations. The FCC wishes to prepare for an incentive auction that results from market variations. The FCC formulates four possible inter-service interference scenarios and seeks comment.

The FCC, in the Further Notice of Proposed Rulemaking, has performed a valuable service in identifying possible forms of inter-service interference. This is laudatory, as these possible interference mechanisms will appear, by their very nature, in large metropolitan areas where spectrum is at a premium and channel sharing is required. The prospect of inter-service interference will be heightened by the fact these areas are densely populated and that population, while dense, is not uniformly distributed.

Based upon unsolicited reports by various clients of this firm, off-the-air viewing has increased over the past few years. Households are discovering that there are many areas in the United States that have a variety of programs that are easily received off-the-air. It appears with the current economic conditions, home off-the-air viewership will continue to increase.

The FCC will be, by its very role, called upon to investigate possible interference complaints where existing off-the-air service is received. Due to low level environmental factors (receiver location, building materials, etc.) the average household reception of off-the-air signal cannot be calculated with 100% confidence or certainty. It behooves the FCC to adopt effective and comprehensive procedures and mechanisms that will allow the introduction of new wireless services without unduly putting the off-the-air household at risk.

In order to determine if and when inter-service interference occurs, the FCC is urged to create a toll-free number and a website which existing off-the-air households can easily access to report potential inter-service problems.

The task before industry and the FCC is to identify areas where market variation is implemented and create in advance, a mechanism that is fully publicized so that the general public will be cognizant which households may be subject to loss of off-the-air service.

Many years ago, the FCC published an *Interference Handbook* which was available free of charge to the public. The FCC should take steps to reimplement an interference handbook which demonstrates how an off-the-air viewer may be faced with interference from a new wireless operation, Part 15 device or other.

The thrust of these comments is to help fulfill the FCC's role in the event market variation becomes a reality. The FCC can help the average household be aware of a new wireless entrant and how it can affect the average receiver household viewing.

The second issue is the FCC appears to pre-suppose 5 MHz blocks for wireless operations. It is unclear as to what the FCC forecasts for potential interference to off-the-air households if 5 MHz blocks are aggregated. For example a common carrier operator which is a successful bidder may combine multiple 5 MHz blocks together for its wireless operations. This possible event and its potential consequences need further FCC clarity.

Respectfully Submitted,

Donald G. Everist

Date: January 21, 2015