

Cohen, Dippell and Everist, P.C.

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

In the Matter of)	
)	
Amendment of Parts 73 and 74 of the)	MB Docket No. 03-185
Commission's Rules to Establish Rules for)	
Digital Low Power Television and)	
Translator Stations)	
)	
Expanding the Economic and Innovation)	GN Docket No. 12-268
Opportunities of Spectrum Through)	
Incentive Auctions)	
)	
Amendment of Part 15 of the Commission's)	
Rules to Eliminate the Analog Tuner)	ET Docket N. 14-175
Requirement)	

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

These reply comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE"). 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 communications industry.

These Reply Comments are based in part on the comments filed by National Translator Association; Sinclair Broadcast Group, Inc.; Public Broadcasting Service; Corporation for Public Broadcasting and Association of Public Television Stations; Consumer Electronics Association; National Association of Broadcasters; and LPTV Spectrum Rights Coalition.

The general thrust of the comments is to continue LPTV and translator service. CDE supports those various comments.

In particular, LPTV Spectrum Rights Coalition provide a comprehensive discussion of steps to minimize the disruption to translators and LPTV stations. There already has been a significant disruption in terms of time and resulting uncertainty that have resulted due to the FCC Incentive Auction proceeding¹.

This firm however does not support the Consumer Electronics Association's position to discontinue the manufacturer of analog tuners. There are still many analog translators, LPTV stations and Class A stations still operating. Along each border, both Canada and Mexico, have receivable analog signals that cross into the United States. Therefore, it is premature to discontinue the analog tuners in the manufacture of new television sets.

Also this firm does not support the position of LPTV Spectrum Rights Coalition with reference to Channel 6 aural services. This firm's view is that it is a clever use of the TV spectrum which skirts the current FCC rules and should have never been authorized by the FCC. The need whatever it was believed is how being fulfilled by the recent FM translator proceeding.²

¹GN Docket No. 12-268; Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions

²*In the Matter of Creation of Low Power Radio Service*, MM Docket No. 99-25; RM-9208, RM-9242, Memorandum Opinion and Order on Reconsideration, Adopted: September 20, 2000; Released: September 28, 2000

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CDE supports all efforts to continue LPTV and translator services.

Respectfully Submitted,



Donald G. Everist

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