

Cohen, Dippell and Everist, P.C.

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

In the Matter of)	
)	
Amendment of Part 15 of the Commission's)	
Rules for Unlicensed Operations in the)	ET Docket No. 14-165
Television Bands, Repurposed 600 MHz)	
Band, 600 MHz Guard Bands and Duplex)	
Gap, and Channel 37, and)	
)	
Amendment of Part 74 of the Commission's)	
Rules for Low Power Auxiliary Stations)	
in the Repurposed 600 MHz Band and)	
600 MHz Duplex Gap)	
)	
Promoting Spectrum Access for Wireless)	
Microphone Operations)	GN Docket No. 14-166
)	
Expanding the Economic and Innovation)	
Opportunities of Spectrum Through)	GN Docket No. 12-268
Incentive Auctions)	

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

The following comments supplements the January 5, 2015 filing submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") and is in response to the Notice of Proposed Rulemaking ("NPRM") released by the Federal Communications Commission ("FCC") on September 30, 2014. CDE and its predecessors have practiced before the 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.

This firm has reviewed the NPRM and applauds the FCC on its review of the history of authorizing wireless microphones and its effort to document the myriad of uses that have resulted (licensed and unlicensed) over the past thirty (30) years.

This firm has assisted various broadcast groups in licensing wireless microphones for a variety of uses in the studio and in electronic news gathering vehicles.

In order to gain a wider view of the current broadcast industry, this firm has requested specific information from some of its AM, FM and TV clients that the FCC posed in Paragraphs 19 and 20 of the NPRM.

To date, the following is typical:

Small Market TV Station

Outdoor or Field (ENG Vehicle) Use

- 20 10 mW/100 mW with the majority operating analog in the 525-650 MHz range

Studio

- 4 Omni directional up to 10 mW with occasional use of outdoor/field units in studio as needed at reduced power
- ENG vehicles range-- 50 Mile radius

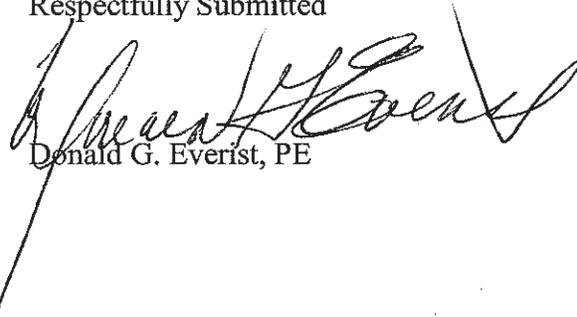
Medium Market TV Station

- More than 50 wireless microphones with a mix used for studio production and field (ENG) news gathering
- All analog units operating in the 525-650 MHz range

- All analog units operating in the 525-650 MHz range
- ENG vehicles range – 500 mile radius

As can be seen with multiple stations in the same markets, intensive frequency usage is probable and likely at major news events. It is obvious television stations are and will have significant future need and deployment of wireless devices in their day-to-day operation.

Respectfully Submitted



Donald G. Everist, PE

Date: February 4, 2015