

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Permitting Remote Pickup Broadcast Auxiliary Stations to Utilize Modern Digital Technologies)))	WT Docket No. 15-36
Petition for Rulemaking Regarding Amendment of Part 74, Subpart D of the Commission's Rules))	
Petition for Rulemaking Regarding Amendment of the Part 74, Subpart D Remote Pickup (RPU) Rules)))	RM-11648
Request for Temporary Waiver of Section 74.462 of the Commission's Rules to Permit Licensee of Remote Pickup Broadcast Auxiliary Stations to Utilize Digital Radio Telephony and Data Emissions))))))	RM-11649

PETITION FOR RECONSIDERATION IN PART

By Edward A. Schober, PE

1. Edward A. Schober, is a licensed professional engineer employed by Radiotechniques Engineering LLC, a New Jersey limited liability company that provides engineering services to broadcasting stations. He is also a member in Winchester Radio Broadcasters, LLC, owner of WXVA(AM), Winchester, VA. Mr. Schober has over twenty-five years experience in advising broadcast radio station clients in areas of RF engineering, station design, FCC technical representation and propagation studies. He is the initial petitioner in this proceeding. Many of these stations are AM facilities. Mr Schober is a member of the AFCCE, and a senior member of the IEEE and SBE. Mr Schober's contact information is:

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2. Mr Schober supports and endorses the Commission's action in this matter, however, it appears that an important technical detail has been overlooked in eliminating 100 kHz bandwidth channels from the UHF band. Mr. Schober requests that the Commission adjust its order in the interests of avoiding the creation of unassignable spectrum in the valuable UHF band.

3. The Order revises §74.462(b) by adding a footnote to the table of authorized bandwidths stating that 100 kHz bandwidth will not be authorized after the effective date of the rule. §74.402(d) was also modified to note that new authorizations for 100 kHz would no longer be issued. It made no changes to the actual channels allocations. Unfortunately this strategy has a serious problem: The ordered scheme makes the spectrum at 450.975 – 451.000 and 455.975 – 456.000 MHz unassignable.

4. There is an obvious alternative to the Commission's order. Mr. Schober proposes the Commission to modify its order to simply extend the list in §74.402(c)(2) to include 450.8875, 450.9125, 450.9375, 450.9625, 450.9875, 455.8875, 455.9125, 455.9375, 455.9625 and 455.9875 MHz. §74.402(d) would be modified to extend grandfathered status to those stations authorized 100 kHz bandwidth. Existing stations previously authorized 50 kHz bandwidth under §74.402(d) should already be assigned frequencies that conform to the revised §74.402(c)(2) .

5. This will achieve all the ends of the proponents while making the "lost channels" available for assignment. It will also provide additional flexibility in assignment as both 25 kHz and 50 kHz bandwidth operation would be available throughout the entire revised frequency list in §74.402(c)(2).

Respectfully Submitted,

A handwritten signature in blue ink that reads "Edward A. Schober". The signature is written in a cursive, flowing style.

Edward A. Schober, PE