

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

In the Matter of)	
)	
Promoting Spectrum Access for Wireless Microphone Operations)	GN Docket No. 14-166
)	
Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions)	GN Docket No. 12-268
)	

COMMENTS OF THE RADIO TELEVISION DIGITAL NEWS ASSOCIATION¹

Fact: Broadcast journalists cover breaking news events and provide critical information to viewers through the use of wireless microphones, from 9/11 to Hurricane Katrina to Superstorm Sandy. Now imagine that in the immediate aftermath of 9/11, a time when terror and fear gripped America, a reporter and her crew have risked their lives to race to the epicenter of the attack and file a live breaking news report. Now imagine that the reporter’s microphone doesn’t work – not because of a technical glitch, but because there is no interference-free spectrum on which it can operate. To state the obvious, this situation does not serve the public interest. But it may be the future of breaking broadcast news coverage unless the Commission acts immediately to identify new exclusive-use bands for wireless microphones.

RTDNA is the world’s largest professional organization exclusively serving the electronic news profession. RTDNA members include local and network news executives, news directors, producers, reporters, digital news professionals, as well as educators and students. Founded as a grassroots organization in 1946, RTDNA works to protect the rights of electronic journalists in the

¹ The Radio Television Digital News Association (“RTDNA”) hereby submits reply comments in response to the FCC’s Notice of Proposed Rulemaking (“NPRM”) in the above-referenced proceedings. *See Promoting Spectrum Access for Wireless Microphone Operations*, Notice of Proposed Rulemaking, 29 FCC Rcd 12343 (2014).

courts and legislatures throughout the country, promotes ethical standards in the industry, provides members with training and education and honors outstanding work in the profession.

RTDNA believes that the public interest must value the vital role broadcast journalists play in reporting on the panoply of American life – from human interest profiles to courtroom verdicts, sports to natural and manmade disasters. The Commission’s decision to squeeze wireless microphones out of exclusive-use spectrum without any plan to replace it is extremely worrisome for RTDNA’s members. RTDNA agrees with the National Association of Broadcasters (“NAB”) that the Commission’s double down of first “jettisoning wireless microphones from reserved channels” and then proposing the unavailability of the “small sliver of spectrum” in the duplex gap will leave journalists who rely on wireless microphones every day in the lurch.² RTDNA also agrees with NAB “it is critical that the FCC focus on immediately identifying new bands on which wireless microphones may operate.”³ RTDNA exhorts the Commission to go further and assure that at least some spectrum is reserved for the exclusive use of wireless microphones, and it agrees with Shure Incorporated that exclusive-use spectrum “give[s] high-priority itinerant microphone users (*e.g.*, emergency news gathering) . . . a known set of always-available frequencies on a nationwide basis.”⁴

RTDNA members must also be able to recoup their investments in the latest 600 MHz-capable microphones. Indeed, RTDNA agrees with Shure that based upon FCC encouragement, many broadcasters “recently purchased professional audio wireless microphones” that “tune to frequencies in the 600 MHz band.”⁵ These microphones “are in many instances state-of-the-art

² Comments of NAB, at 4.

³ *Id.*, at 1.

⁴ Comments of Shure Incorporated, AU Docket No. 14-252, GN Docket No. 12-268, at 4 (Feb. 20, 2015).

⁵ *Id.*

and spectrally efficient,” and with an anticipated use of “a decade or more of operation in the 600 MHz band without disruption.”⁶ At minimum, the Commission must allow RTDNA members to operate 600 MHz-capable microphones for as long as possible after the auction (i.e. until the threat of interference to other operations is capable of being realized).

The Commission must do more than pay lip service to the “important role” that “[w]ireless microphones play . . . in enabling broadcasters and other video programming networks to serve consumers.”⁷ The public interest demands that the agency “identify as many new bands for wireless microphones as possible before the incentive auction begins,” including exclusive-use bands.

Respectfully submitted,

By: _____/s/_____

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⁶ *Id.*
⁷ NPRM, ¶ 1.