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 Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap, and Channel 37, and	)	ET Docket No. 14-165
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 Incentive Auctions	)	GN Docket No. 12-268

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.

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. The following is additional information received from clients and supplements this firm's comments.

Top 30 Markets

Photographers

20 analog and digital 490-596 MHz

Production

A Digital 560-590 MHz

Studio

20 Digital 570-600 MHz

ENG Vehicles

6 Digital 610-660 MHz

ENG Radius 500 Miles

Very small market stations– typical

Outdoor and Studio Combined (unless otherwise noted)

2	Analog	470-506 MHz	Range 100 ft. (30 meters)
1	Analog	72.3 MHz	Range 100 ft. (30 meters)

1	Analog	514.675 MHz	Range 100 ft. (30.5 meters)
3-4	Digital[1]	518.5 MHz	Range 500 ft. (152 meters)
1	Digital	614-793 MHz	Range 300 ft. (91meters)

No ENG vehicles in these markets

As can be seen with multiple stations in the same markets, intensive frequency usage is probable and likely at major new 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

DATE: February 25, 2015

[1]Engineering