

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

In the Matters 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)	RM-11648
)	
Petition for Rulemaking Regarding Amendment of the Part 74, Subpart D Remote Pickup (RPU) Rules)	RM-11649
)	
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)	

COMMENTS OF MOTOROLA SOLUTIONS INC.

Motorola Solutions, Inc. ("Motorola Solutions") hereby submits these comments in support of the Commission's Notice of Proposed Rulemaking to eliminate outdated rules and to promote the use of modern technologies for Part 74 Remote Pickup (RPU) stations.¹

RPUs are a type of Broadcast Auxiliary Station (BAS) that make it possible for television and radio stations, as well as other eligible producers of programming material, to transmit audio and video from remote sites to studios or other production centers. In addition, RPU stations are used for signaling and the coordination and dispatching of crews and staff that are involved in the remote production of program material.

Under Part 74 of the Commission's Rules, RPUs use HF, VHF and UHF frequencies that are either also available for assignment in the Part 90 Private Land Mobile Radio Services

¹ Permitting Remote Pickup Broadcast Auxiliary Stations to Utilize Modern Digital Technologies, WT Docket No. 15-36, *Notice of Proposed Rulemaking*, FCC No. 15-22 (rel. Feb. 18, 2015) ("*Notice*").

(PLMRS) or are near frequencies available for PLMRS use. According to the *Notice*, when the Commission established the current RPU service rules in 2002, its goal was to harmonize the RPU technical standards with the Part 90 rules so that broadcasters could use radios developed for Part 90 PLMRS use for RPU use, particularly for dispatch and operational traffic.²

Motorola Solutions is the leading manufacturer of two-way radios authorized for use under Part 90 and other sections of the Commission's rules that pertain to the mobile services. Motorola Solutions currently markets and sells such radios to broadcasters and other program production entities for remote pickup applications. As such, it has experienced the negative impact of the obstacles that are created by certain outdated technical provisions of Part 74 that the instant *Notice* is proposing to correct. In short, Motorola Solutions strongly supports all of the proposals contained in the *Notice* and urges the Commission to expedite their adoption and implementation prior to the end of 2015.

In particular, Motorola Solutions agrees with the proposed modifications to Section 74.462 that would enable the use of any form of modulation, including digital modulations, on RPU frequencies provided that the emission conforms to the relevant emissions mask and bandwidth requirements. This technology-neutral approach has been applied in other land mobile services for years and will help ensure that Part 74 licensees have access to state-of-the-art equipment offering improved performance and advanced operating features and, at the same time, being able to take advantage of the vast manufacturing economies of scale that are available today for digital technologies.

In addition to the proposals contained in the *Notice*, Motorola Solutions urges the Commission to consider ways of minimizing any burdens on manufacturers to update the

² *Id.* at ¶ 3.

certification of existing equipment once the new rules are approved. Ideally, compatible devices that are authorized under Part 90 of the Commission's Rules would be able to be immediately deployed on Part 74 without need for modifying the grant of equipment approval. To accomplish this goal most simply, Section 74.751(a) could be modified to enable the use of radios certificated for use under either Part 74 or Part 90. Motorola Solutions proposals that this rule be modified to as follows (new text double-underlined):

§74.451 Certification of equipment.

(a) Applications for new remote pickup broadcast stations or systems or for changing transmitting equipment of an existing station will not be accepted unless the transmitters to be used have been certificated by the FCC pursuant to the provisions of this subpart, or those of Part 90 of this chapter and do not exceed the output power limits specified in §74.461(b).

This change should not be considered controversial as Section 74.462(c) describes the fundamental emissions requirement for Part 74 transmitters in terms of compliance with the emission mask and transient frequency behavior requirements of Section 90.210 and Section 90.214. For transmitters that meet those specifications and are already certified under Part 90, there is no reason to compel their recertification to specify Part 74 compliance. Going forward, manufacturers can include Part 74 certification for new or modified products already undergoing testing but it would be form over substance to require existing products to modify their grants before being allowed to operate on Part 74 frequencies without waiver.

Respectfully submitted,

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