

Cohen, Dippell and Everist, P.C.

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

In the Matter of)	
)	
Incentive Auction Task Force Releases)	AU Docket No. 14-252
Initial Clearing Target Optimization)	GN Docket No. 12-268
Simulations)	

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

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. (“CDE”) and is in response to the Public Notice, DA 15-606, released by the Commission on May 20, 2015. 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.

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.

These comments focus on the very important issues of potential interference to DTV stations by the repacking process from wireless services being located in the 600 MHz band. It is noted the following is abstracted from Paragraph 32, beginning with the 10th line, from the release of the FCC document entitled, “Comment Sought on Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auctions 1001 and 1002” released December 17,

2014. Paragraph 32, Tenth Line, states as follows:

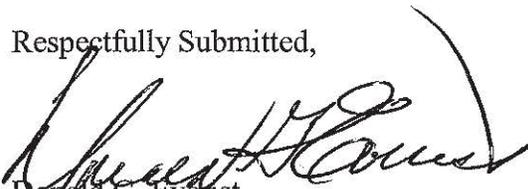
32. “. . . Any television stations assigned to channels in the 600 MHz Band will be entitled to the same protection in the repacking process as other TV stations, and will be protected from inter-service interference under the standards we adopt in the *ISIX* proceeding, in which we have proposed not to allow any harmful interference to TV stations from wireless services”.⁸⁵

While there is a question on the meaning of “harmful interference”, the intent is clear and the FCC should be cognizant of other information concerning protection to existing TV service areas that may be available now or in the immediate future.

Further, what change to the existing DTV service area will result from new wireless operation if the existing TV station remains reassigned to the same channel in the repacking and now is confronted with accommodation due to market variation from wireless services. Under this scenario, will the existing television station be fully protected by existing protection criteria or technical information that may soon come available in the near future?

This firm appreciates the complexity and challenges that the FCC must consider as it devises comprehensive procedures for Inter-Service Interference as contained in the Inter-Service Interference (“ISIX”) Order and Further Notice. This firm also urges the FCC to be available to update its Inter-Service protection criteria as this proceeding continues.

Respectfully Submitted,


Donald G. Everist

DATE: June 3, 2015

⁸⁵See *ISIX Further Notice*, 29 FCC Rcd at 13106, paras. 65-66 (proposing zero-percent-interference-to-TV-stations standards)