

Cohen, Dippell and Everist, P.C.

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

In the Matter of	)	
	)	
Office of Engineering and Technology	)	
Releases Final Version of <i>TVStudy</i> and	)	GN Docket No. 12-268
Releases Baseline Coverage Area and	)	ET Docket No. 13-26
Population Served Information Related to	)	
Incentive Auction Repacking	)	

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 released by the Federal Communications Commission on June 30, 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.

The firm is familiar with the FCC Rules and FCC procedures. It is also familiar with the completion of the engineering sections of FCC forms for authorization for construction permit and license.

The recent experience in fulfilling the FCC mandate of July 9, 2015<sup>1</sup> was not without considerable difficulty. There were a number of flaws that were encountered by the electronic FCC Form 2100, Section 381 as well as FCC Form 2100 entitled, “Modification of License for DTV”. The instructions for these submissions were not sufficient to avoid flaws, uncertain completion and delays. In fact, when data was corrected the hard copy printout provided an incorrect number. This firm in order to proof any FCC submission has always relied on a hard copy printout.

The Public Notice dated February 13, 2015, *Media Bureau Announces Completion of Second Phase of Licensing and Management System for Full Power, Class A, Low Power and TV Translator Stations*” refers specifically to Schedule A, B, etc. This firm has yet to see any reference to Schedule A, B, etc., on the Form 2100. We further see discrepancies in the naming of the forms, i.e., Schedule A (not shown on Form 2100)--similar FCC Form instructions lapse are noted.

Another example for a license application using FCC Form 2100, the transmitter power output (“TPO”) in order to complete the form requires 3 decimal places. This suggests an accuracy that cannot be achieved in actual practice.

---

<sup>1</sup>From FCC Public Notice entitled, “*Media Bureau Announces Incentive Auction Eligible Facilities and July 9, 2015 Deadline for Filing Pre-auction Technical Certification Form*”, FCC Public Notice, Released June 9, 2015.

Similarly other problems with the new electronic form were encountered. It is one thing to encounter these electronic form deficiencies in routine filings but not when there is a FCC imposed dropdead date.

This firm applauds the FCC efforts to correct and improve the usability of TV Study 1.3.2. However, we continue to find significant differences when compared with this firm's FLR program. For example for interference studies, the difference from that filed versus the current version of TVStudy 1.3.2 are as follows:

<u>Scenario</u>	<u>FLR</u>	<u>Current Versus TV 1.3.2</u>
1	1.09%	0.72%
2	1.36%	0.95%
3	1.54%	0.38%

The FCC has yet to explain these significant differences.

Conclusion

This firm requests the FCC to implement a viable electronic form when the remaining stations at the completion of the Incentive Auction are required to file within the allotted time. An unworkable electronic form or partially workable electronic form will frustrate all stakeholders.

The second request is similar to prior filings on the TV Study program. Why does this firm continue to find significant differences from the FLR version versus the TV Study 1.3.2?

Respectfully Submitted,

COHEN, DIPPELL AND EVERIST, P.C.

A handwritten signature in black ink, appearing to read "Donald G. Everist", written in a cursive style.

Donald G. Everist  
President

DATE: July 30, 2015