

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC

In the matter of:	)	
	)	<b>RM-9682</b>
Creation of an Indoor Sports and Entertainment	)	DA 99-1337
Radio Service	)	
	)	

**COMMENTS OF REC NETWORKS**

1. REC Networks (“REC”) supports the petition for rulemaking made by the National Hockey League (“NHL”) for the creation of an Indoor Sports and Entertainment Radio Service (“ISERS”).
2. REC feels that ISERS could provide visitors to enclosed sports arenas with entertainment, news and information on the FM Broadcast Band while attending a sporting or entertainment event without having to purchase or rent a special type of radio receiver. In the extreme case, these stations could promote safety inside an arena by providing essential announcements by the public address announcer in the unlikely event of an emergency. Public address systems are sometimes very difficult to hear, especially for those who have hearing impairments.
3. The NHL is proposing an operation, which would involve the use of multiple channels. REC supports a multiple channel arrangement as long as it does not prevent the reception of full power broadcast stations as well as future low power broadcast stations currently under consideration in MM Docket 99-25 (“LPFM”). REC is asking that ISERS stations be secondary to full power and primary LPFM

stations as well as being sub-secondary to translators, boosters and any LPFM stations that may be designated as secondary status.

4. REC feels that ISERS should be authorized by license. Facilities eligible for ISERS should be limited to fully enclosed structures which have a minimum seating capacity for 10,000 seated persons and engaged in the presentation of professional and/or college sporting events. REC does not feel that small venues, such as high school gymnasiums should be eligible for ISERS. Based on the small size of such facilities, REC feels that these facilities can be better served by intentional radiators in the FM broadcast band operating under the provision of Part 15 of the FCC Rules.
  
5. REC must insist that these authorizations be given only to fully enclosed arenas. These arenas are usually engaged in the sports of hockey, basketball, arena football and indoor soccer. The walls of the stadium can help suppress a low power signal to the field strengths that are being proposed in this rulemaking. For outdoor sports facilities such as baseball and football stadiums, REC recommends the shared time 10-watt service proposed in our comments in MM Docket 99-25 as well as leaky coax, carrier current and intentional radiators covered in Part 15 of the FCC Rules. Large baseball and football stadiums with “domes” should be eligible for ISERS as long as the structure is totally enclosed at all times. “Retractable” stadiums, like the Bank One Ballpark in Phoenix utilize a retractable roof and side panels which would allow signals to radiate outside the confines of the structure and therefore should not be eligible for ISERS.

6. REC feels that ISERS stations should only be authorized enough power to provide a strong signal throughout the open seating area of the arena. Outside the arena, field strengths need to be kept to a minimum and the field strength should be 0 dBu at points at points more than 0.5 km outside the outer perimeter of the arena. As noted in the NHL petition, power for these stations should not exceed 5 watts.
  
7. We feel that a very basic distance spacing method should be used to determine operating frequencies. No ISERS station would be permitted within the 60 dBu service contour (50,50 method) of any primary or secondary station (including LPFM). No ISERS station would be permitted within the 70 dBu first adjacent channel service contour of any primary or secondary station (including LPFM). Appendix A of these comments gives information on our recommended distance spacing for ISERS stations. REC feels that ISERS channels can be coordinated through the LPFM Frequency Coordinator proposed by REC in our comments for MM Docket 99-25.

8. For translators, boosters and Class-D (Secondary) stations, REC recommends that translators be “sub-classed” into three separate sub-classes based on the antenna height and operating power of the secondary station. This is the same exact chart we used to determine translator sub-class in our comments on MM Docket 99-25.

Secondary LPFM stations would not subject to this sub-class method. To make the application process easier, the following matrix should be used to determine the sub-class of secondary translator, booster and educational stations:

HAAT in meters	ERP (watts)						
	0-10	10.1-25	25.1-50	50.1-75	75.1-125	125.1-200	200.1-250
0-30	A	A	A	A	A	A	A
30.1-60	A	A	A	B	B	B	B
60.1-90	A	A	B	B	B	B	B
90.1-120	A	B	B	B	B	B	C
120.1-150	A	B	B	B	B	C	C
150.1-180	A	B	B	B	C	C	C
181.1-210	B	B	B	C	C	C	C
210.1-330	B	B	C	C	C	C	C
330.1-540	B	C	C	C	C	C	C
540.1-UP	C	C	C	C	C	C	C

9. As mentioned before, ISERS stations are not subject to any protection from any other class of broadcast station (including secondary classes). ISERS stations should be listed in the FCC Engineering Database as Class D3. ISERS stations in adjacent venues should not be authorized on the same channels as both venues may have simultaneous events. If there are not enough channels to meet the needs of multiple venues, the venues should develop a channel sharing plan which would assure that both venues would be able to provide the best service possible.

10. In conclusion, ISERS would prove to be a beneficial service, enhancing the spectator experience, promoting safety and helping the economy of the local businesses in and around the stadium. With such a service, we must feel that fans should also have the right to choose which radio station they want to listen to while inside the arena. We must provide all radio stations (full power, low power and secondary) with protections, which entitle them to have their signal heard inside the stadium. The establishment of the ISERS, concurrent with the establishment of the Low Power Radio Service would meet the public interest. We urge the Commission to give RM-9682 further consideration.

Respectfully Submitted,

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**APPENDIX “A” – PROPOSED DISTANCE SEPERATIONS FOR CLASS D3 (ISERS) STATIONS.**

Class of nearby station:	Co-Channel (60 dBu)	First Adjacent (70 dBu)
A, Mex. A, Mex. AA, Can. A	29	17
C3, B1, Mex. B1, Can. B1	40	24
B, C2, Mex. B, Can. B	53	33
C1, Mex. C1, Can. C1	72	50
C, Mex. C, Can C	92	68
LP-1000, A1	15	8
LP-250, A2	9	7
LP-100 A3 D1	6	4
Microradio D2	4	2
Translator-A	8	6
Translator-B	14	8
Translator-C, Can A1	22	12

No protections for second adjacent, third adjacent or IF is proposed for Class D3 stations.

**ARENA STATIONS WILL BE PERMITTED TO APPLY FOR VACANT CHANNELS THAT ARE ALSO AVAILABLE TO HIGHER CLASS STATIONS. THE ARENA OPERATIONS WILL BE SECONDARY AND ARE SUBJECT TO DISPLACEMENT IF THE CHANNEL IS NEEDED BY A FULL POWER STATION, LPFM STATION, TRANSLATOR OR BOOSTER.**

**APPENDIX “B” – ARIZONA MICRORADIO ASSOCIATION RECOMMENDED CHANNELS FOR PHOENIX AREA ARENAS WHICH WOULD QUALIFY UNDER ISERS.**

**AMERICA WEST ARENA**

*Phoenix Suns NBA Basketball*

*Phoenix Coyotes NHL Hockey*

*Arizona Rattlers Arena Football*

Jefferson & First Streets, Phoenix.

AzMA recommends **93.9 99.5 106.5 107.5**

**VETERAN’S MEMORIAL COLISEUM**

*Phoenix Minor League Hockey*

*Phoenix Indoor Soccer*

19<sup>th</sup> Avenue & McDowell Rd, Phoenix.

AzMA recommends **93.9 99.5 106.5 107.5**

**WELLS FARGO ARENA**

*Arizona State University Basketball*

*Other ASU Indoor College Sports*

**(Formerly University Activity Center)**

Arizona State University Campus, Tempe, Arizona.

AzMA recommends **93.9 99.5 106.5 107.5**

**LOS ARCOS STADIUM DISTRICT SITE**

*Possible future home of the Phoenix Coyotes NHL Hockey Team*

McDowell & Scottsdale Rd, Scottsdale.

AzMA recommends **93.9 99.5 106.5 107.5**

## **CERTIFICATE OF SERVICE**

REC Networks has served a copy of these comments upon the petitioner:

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(Served by electronic mail with the consent of the petitioner.)