

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

In the Matter of )  
 )  
Revisions to Broadcast Auxiliary Service ) ET Docket No. 01-75  
Rules in Part 74 and Conforming Technical )  
Rules for Broadcast Auxiliary Service, )  
Cable Television Relay Service and Fixed )  
Services in Parts 74, 78 and 101 of the )  
Commission's Rules )

To: Chief, Office of Engineering and Technology

**REQUEST FOR EXTENSION OF TEMPORARY STAY**

The Association for Maximum Service Television, Inc. ("MSTV") and the National Association of Broadcasters ("NAB")<sup>1</sup> hereby request the Office of Engineering and Technology ("OET") to further delay the effective date of the prior coordination notice ("PCN") procedures adopted in the above-captioned proceeding<sup>2</sup> for most fixed point-to-point Aural and TV Broadcast Auxiliary Service ("BAS") stations. The new PCN procedures are scheduled to become effective on October 16, 2003, pursuant to a stay granted on April 15, 2003.<sup>3</sup>

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<sup>1</sup> MSTV is a non-profit trade association of local broadcast television stations committed to achieving and maintaining the highest technical quality for the local broadcast system. NAB is a non-profit, incorporated association of radio and television stations that serves and represents the American broadcast industry.

<sup>2</sup> *Revisions to Broadcast Auxiliary Service Rules in Part 74 and Conforming Technical Rules for Broadcast Auxiliary Service, Cable Television Relay Service and Fixed Services in Parts 74, 78 and 101 of the Commission's Rules*, Report and Order, ET Docket No. 01-75, FCC 02-298, 17 FCC Rcd 22,979 (2002).

<sup>3</sup> *Revisions to Broadcast Auxiliary Service Rules in Part 74 and Conforming Technical Rules for Broadcast Auxiliary Service, Cable Television Relay Service and Fixed Services in Parts 74, 78 and 101 of the Commission's Rules*, Order, ET Docket No. 01-75, DA 03-1141 (rel. Apr. 15, 2003).

On October 1, 2003, the Society of Broadcast Engineers, Inc. (“SBE”) filed a Request for Extension of Temporary Stay (“SBE Stay Request”), requesting that the effective date for the new PCN procedures be extended by six months from the scheduled date of October 16, 2003. As explained in greater detail in the SBE Stay Request, implementation of the new PCN procedures has been severely hampered by inaccuracies in the FCC Universal Licensing System (“ULS”) legacy database, which would be used by frequency coordinators under the new procedures. Without accurate information in the ULS database, frequency coordination efforts using the new PCN procedures would be almost meaningless, as they would not guarantee that new coordinated facilities would not cause interference to existing licensees. MSTV and NAB agree with SBE that a six-month extension of the temporary stay will provide an opportunity to gather the information missing from the ULS database and to bring it up to date.

Thus, MSTV and NAB join SBE’s request that OET extend by six months the temporary stay of the effective date of the PCN procedures.

Respectfully submitted,

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