

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of	)	
	)	
Revisions to Broadcast Auxiliary Service Rules	)	
Part 74 and Conforming Technical Rules for	)	ET Docket No. 01-75
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

**COMMENTS OF UNIVISION TELEVISION GROUP, INC.  
IN SUPPORT OF REQUEST FOR EXTENSION OF TEMPORARY STAY**

Univision Television Group, Inc. ("UTGI"), by its attorneys, hereby submits its comments in support of the Request for Extension of Temporary Stay ("Request") filed by the Society of Broadcast Engineers, Incorporated ("SBE") on October 1, 2003. The Request seeks an extension of the temporary stay of the effective date of the prior coordination notice ("PCN") frequency coordination procedures for broadcast auxiliary stations. The Commission adopted these PCN procedures pursuant to its *Report and Order*, 17 FCC Rcd 22979, released November 13, 2002 in the above-captioned proceeding. Subsequently, however, by *Order* released April 15, 2003, the Chief of the Office of Engineering and Technology stayed the effectiveness of the PCN rules until October 16, 2003, in light of serious flaws in the Universal Licensing System ("ULS") database that is to be used for compliance with the new PCN requirement. Given that the ULS database's substantial shortcomings have not been resolved during the initial stay period, UTGI supports SBE's request for a six-month extension of the stay.

UTGI indirectly owns and operates 54 full-power, Class A, and low-power television stations located in various markets throughout the United States. As the licensee of a substantial number of stations, UTGI holds numerous broadcast auxiliary licenses that are subject to the new PCN requirements, and it stands to be adversely affected should those procedures be implemented before the Commission's databases are adequately updated.

Although UTGI has updated the Commission's ULS database to include receive site information for its own broadcast auxiliaries, that process has highlighted to UTGI the large number of facilities in ULS owned by others that still lack accurate information. Accordingly, UTGI agrees with SBE's assessment that the database continues to contain incomplete and inaccurate information.

In granting the initial stay, the Commission itself acknowledged that "[w]e agree with SBE that legacy database inaccuracies in the ULS could seriously affect the efficacy of prior coordination procedures, which was not anticipated when the Order setting these procedures was adopted." *Order* at ¶ 4. While the Commission estimated that a delay of six months was the proper length of time to rectify the errors in the ULS database, it is now clear that six months was insufficient, as substantial problems continue to persist. Furthermore, as detailed in SBE's Request, the Commission's delay in reviewing, and its ultimate rejection of, a request for the waiver of filing fees associated with applications seeking to update the ULS database appears to have contributed to a continued lack of complete and accurate information in the database.

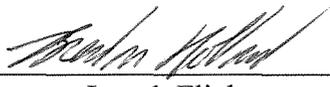
The effect of these inaccuracies is also likely to go unnoticed by a non-local frequency coordinator who does not have sufficient familiarity with local market conditions to identify obvious conflicts caused by the lack of, or inaccuracy in, receive site information. Thus, the

existing informal local frequency coordination process provides better and more reliable results at this point in time.

As the Commission's current ULS database cannot reliably meet the demands of the PCN requirement for broadcast auxiliaries, UTGI urges the Commission to grant SBE's request for a six-month extension of the temporary stay of the PCN rules.<sup>1</sup>

Respectfully submitted,

**UNIVISION TELEVISION GROUP, INC.**

By:   
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Lauren Lynch Flick  
Brendan Holland

*Counsel for Univision Television Group, Inc.*

Shaw Pittman LLP  
2300 N Street, N.W.  
Washington, D.C. 20037  
(202) 663-8000

Dated: October 15, 2003

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<sup>1</sup> Alternatively, if the Commission does not grant the requested stay, it should permit parties to add, or make corrections to, the ULS database for existing broadcast auxiliary authorizations without requiring prior coordination notice. To do otherwise would force the unnecessary re-coordination of facilities that in many cases have been operating for decades, and ultimately discourage licensees from correcting the ULS database.