

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

In the Matter of )  
 )  
Modification of the Universal Licensing ) RM No. 11308  
System to Allow TV Pickup Stations )  
and Remote Pickup Stations to Document )  
the Locations and Heights of Their )  
Receive-Only Sites )  
 )

To: The Commission

The Society of Broadcast Engineers, Incorporated (SBE), the national association of broadcast engineers and technical communications professionals, with more than 5,000 members world wide, hereby files its comments in response to the Commission's January 23, 2006, Public Notice regarding a September 6, 2005, Petition for Rulemaking filed by SBE, proposing to modify the Universal Licensing System (ULS), and FCC Form 601, to allow TV Pickup licensees to document the location(s) and height(s) of their electronic news gathering (ENG) receive only (RO) sites, and also to allow Remote Pickup (RPU) licensees to similarly document the location(s) and height(s) of their RPU-RO sites. The Public Notice assigned the petition a rule making number, RM-11308, and requested public comments for or against the proposal, with a 30-day (*i.e.*, February 22, 2006) filing deadline.

**I. SBE Reaffirms Its Support for RM-11308**

1. SBE reaffirms its support of this proposal. The need for TV Pickup licensees to be able to document the location(s) and height(s) of their ENG-RO sites in the ULS, so that other licensees and adjacent band commercial mobile radio service (CMRS) operators can identify the locations of such sites on a searchable basis, has not diminished since SBE filed its Petition. Highly sensitive ENG-RO sites continue to be at risk of interference from high power adjacent band CMRS base stations; such operators cannot afford inadvertently locating a base station too close to an ENG-RO site if they have not practical means of locating such sites. Therefore, FCC Form 601, and the ULS, need to be modified to live up to the "universal" claim.

2. Other potential users, such as Department of Defense uplinks, as proposed in the ET Docket 00-258 rulemaking, Broadband Radio Service (BRS) Channel 1 licensees, Mobile Satellite Service (MSS) Ancillary Terrestrial Component (ATC) licensees, and even Part 15 IEEE 802.11(b)

## **RM-11308: Modifying the ULS To Allow Documenting ENG-RO and RPU-RO Sites**

Wi-Fi" entities, would also benefit from being able to search the ULS by specifying a set of geographical coordinates and a search distance.<sup>1</sup>

### **II. What the Petition Does *Not* Propose**

3. SBE wishes to clarify some items that its Petition does *not* propose, in response to concerns that SBE has informally received:

3A. The decision whether to document the location(s) and height(s) of ENG-RO sites, or RPU-RO sites, would be entirely voluntary by TV Pickup and RPU licensees. If such licensees do not wish, for some reason, to have this information available to others, then they would take no action.

3B. The Petition does not propose any changes to the TV broadcast auxiliary service (BAS) technical or operational rules. There are no proposed changes to existing frequency stability or emission mask requirements.

3C. The Petition does not propose any minimum separation distance to be afforded to an ENG-RO or RPU-RO site by other stations. The goal is simply to allow any interested party to be able to quickly and accurately determine if there is a nearby ENG-RO site, or a nearby RPU-RO site, that they may want to take into consideration.

### **III. ENG-RO and RPU-RO Data Would Allow Anonymity to Querying Parties**

4. If the ULS and Form 601 are amended to allow TV Pickup licensees and RPU licensees to voluntarily enter information regarding their ENG-RO or RPU-RO sites, this would allow interested parties that might not want to risk revealing a planned deployment of a new CMRS build by making telephone calls to individual BAS licensees, or making a query to an SBE-affiliated frequency coordinator. The calling up of information regarding the location(s) and height(s) of ENG-RO sites or RPU-RO sites would be a matter solely between the ULS and the interested party.

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<sup>1</sup> It should be noted that most ENG-RO sites have receivers capable of tuning the three 2.5 GHz TV BAS channels, A8 (2,450–2,467 MHz), A9 (2,467–2,483.5 MHz) and grandfathered Channel A10 (2,483.5–2,500 MHz), as well as the seven 2 GHz TV BAS channels. Thus, the location of ENG-RO sites is of interest to BRS, MSS ATC, and Wi-Fi operators.

**IV. Summary**

5. For the above cited reasons, SBE urges the Commission to proceed forthwith to a Notice of Proposed Rulemaking (NPRM). If an NPRM is issued, SBE will participate in that rulemaking.

Respectfully submitted,

Society of Broadcast Engineers, Inc.

/s/ Chriss Scherer, CPBE  
SBE President

/s/ Dane E. Ericksen, P.E., CSRTE, 8VSB, CBNT  
Chairman, SBE FCC Liaison Committee  
Chairman, ATSC TSGS3 Specialist Group on Digital ENG

/s/ Christopher D. Imlay, Esq.  
General Counsel

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