

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

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In the Matter of: )	
)	
Amendment of Part 2 of the Commission's )	ET Docket No. 00-258
Rules to Allocate Spectrum Below 3 GHz )	
For Mobile and Fixed Services to Support )	
The Introduction of New Advanced )	
Wireless Services, Including Third )	
Generation Wireless Services )	
)	
Amendment of Section 2.106 of the )	ET Docket No. 95-18
Commission's Rules to Allocate Spectrum )	
at 2 GHz For Use By The Mobile Satellite )	
Service )	
)	
Establishment of Policies and Service )	IB Docket No. 99-81
Rules for the Mobile-Satellite Service )	
In the 2 GHz Band )	
_____ )	

**COMMENTS OF THE  
ASSOCIATION FOR MAXIMUM SERVICE TELEVISION, INC.**

The Association for Maximum Service Television, Inc. ("MSTV"), television broadcasting's leading trade association for technology and spectrum policy, strongly supports the Petition for Reconsideration filed in these dockets by the Society of Broadcast Engineers ("SBE").<sup>1</sup> In its Petition, SBE requests that the Commission clarify that the stringent interference protection criteria described in the Seventh Report and

<sup>1</sup> Society of Broadcast Engineers, Inc., Petition for Recon., *Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz For Mobile and Fixed Services*, ET Docket No. 00-258 (filed May 2, 2006).

Order<sup>2</sup> will continue to apply to Department of Defense uplink earth stations in the 2025-2110 MHz band.

The Broadcast Auxiliary Services (“BAS”) spectrum is of eminent importance to broadcasters, which use these frequencies routinely to support critical electronic newsgathering (“ENG”), studio-transmitter link, and other functions. If the Commission reduces the interference protections afforded to the BAS, the competing uses by the Department of Defense in adjacent frequencies could threaten the viability of this spectrum for BAS users.

In particular, as SBE explains in its Petition, noise floor degradation of greater than 0.5 dB caused by adjacent Department of Defense users would substantially impede broadcasters’ ability to rely on the BAS, particularly since, as SBE describes, there is little incentive for the Department of Defense to engage in true coordination efforts with broadcasters. As MSTV has explained elsewhere, BAS is a vital component of broadcasters’ ability to provide up-to-the-minute news and critical information to the public, and harmful interference from adjacent users, including the Department of Defense, would severely impede broadcasters’ ability to fulfill their public interest objectives.

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<sup>2</sup> *Amendment of Part 2 of the Commission’s Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services*, Seventh Report and Order, ET Docket No. 00-258, 19 FCC Rcd. 21350 (2004) (“Seventh Report and Order”).

Accordingly, MSTV urges the Commission to grant SBE's Petition for Reconsideration and clarify that the interference protections described in the Seventh Report and Order, with respect to Department of Defense users in the 2025-to-2110 MHz band, remain in effect.

Respectfully submitted,

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