



ASSOCIATION OF

FEDERAL COMMUNICATIONS CONSULTING ENGINEERS

WASHINGTON, D.C.

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December 29, 2006

FILED/ACCEPTED

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Federal Communications Commission
Office of the Secretary

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby, Room TW-B204
Washington, DC 20554

Re: Request for Extension of the January 11, 2007
Deadline for Review of Seventh Further Notice
Of Proposed Rule Making, MB Docket No. 87-268

Dear Ms. Dortch:

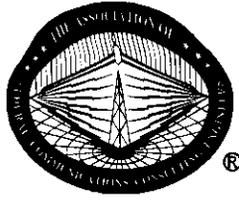
The Association of Federal Communications Consulting Engineers (AFCCCE), celebrating over 50 years, is an organization that includes approximately 90 full members who are Registered Professional Engineers engaged in the practice of consulting engineering before the Federal Communications Commission.

This letter is to request that an extension be given to the outstanding deadline of January 11, 2007 concerning a review of the proposed DTV Table of Allotments¹ of the Seventh Further Notice of Proposed Rule Making, MB Docket No. 87-268 ("Seventh Further Notice"). The Commission in the Seventh Further Notice, Paragraph 16, indicates that "we invite comment on our new DTV Table." There are several reasons in which this request is made. Briefly, consulting engineering firms find that:

- There are a multitude of engineering details that must be reviewed in order to fully respond to the Commission request and Table B

¹Contained in Table B

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- The ability to adequately review and analyze the technical parameters to give opinions to clients and their attorneys to achieve a coordinated response is a lengthy and involved process
- This process could not be anticipated in advance of the FCC's Seventh Further Notice.
- Other special filing events have also been slated to occur in this period. For example, the Commission's broadcast ownership rules² which just received an extension and the resolution of the mutually exclusive conflicts in the LPTV and TV translator companion channel³ applications. Further occupying this period was the Auction 70 filings due December 19, 2006 and the beginning January 10, 2007 of Auction 68. Special time and attention was required by many communication law firms and engineering firms.
- The Commission provided that comments are to be filed by January 11, 2007. This time period includes major holidays, Thanksgiving, Christmas and New Year's, during which staff have scheduled vacation time for these holidays. All of the studies, recommendations, and exchanges of information have been with the intervening 3 major holidays since its release on October 20, 2006. Further, President Bush has declared Tuesday, January 2, 2007 the Federal offices closed as a National Day of Mourning for President Ford.⁴

The AFCCE recognizes the importance of implementing a final DTV table as soon as constructively feasible and it recognizes the importance of validating the technical data published in the Seventh Further Notice. AFCCE recognizes that the Seventh Further Notice is a very important step and applauds the Commission's efforts as

²See Order, released December 15, 2006 in MB Docket No. 06-121

³See Public Notice DA06-2034 released October 17, 2006 entitled, "LPTV and TV Translator Digital Companion Channel Applications Mutually Exclusive Proposals"

⁴See page 1 of *The Washington Post* and *The Washington Times*



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AFCCE believes it represents a valuable contribution to the final step in the transition process. However, industry finds that this is a very time consuming and complicated process to review and comment. Unfortunately, having less than ninety (90) days abbreviated by three major holidays is an insufficient amount of time in which to make use of all the techniques to determine the adequacy of the proposed table. That choice will result in a station being on that channel with those facilities for the foreseeable future, and therefore, extra time is required to examine all technical parameters and the resultant coverage to prudently (to minimize steps and multiple subsequent filings) so as to minimize disruption to off-the-air viewers and conserve valuable FCC resources.

It is herein requested that the Commission permit a 30-day extension from January 11, 2007 deadline in which to allow additional time to study and to conduct further analysis for the DTV Table proposed in the Seventh Further Notice.

If there are any questions, please do not hesitate to contact this office.

Respectfully submitted,

Michael D. Rhodes,
President
AFCCE
(703) 392-9090