

Cohen, Dippell and Everist, P.C.

Before The
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Promoting Expanded Opportunities for Radio)	ET Docket 10-236
Experimentation and Market Trials under Part 5)	
of the Commission's Rules and Streamlining)	
Other Related Rules)	
2006 Biennial Review of Telecommunications)	ET Docket No. 06-105
Regulations - Part 2 Administered by the)	
Office of Engineering and Technology (OET))	

Comments
on Behalf of
Cohen, Dippell and Everist, P.C.

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") and is in response to ET Docket No. 10-236, Notice of Inquiry, FCC 10-197, adopted: November 30, 2010 and released November 30, 2010. CDE and its predecessors have practiced before the Federal Communications Commission ("FCC") for over 70 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and performed professional consulting engineering services to the communications industry.

The undersigned is licensed as a Professional Engineer in the District of Columbia and has been in continuous employment with this firm or its predecessors for over fifty (50) years.

The FCC proposes rule changes to the experimental licensing program. The purpose is to promote innovation and research. There are six areas in which the FCC proposes relief. CDE supports these laudable goals.

Three of the areas are to more expeditiously permit research program experimental license, a zone program and medical program experimental license. These as envisioned by the FCC would be available to universities and research institutions. The FCC should broaden this area to other business (for profit) who have previously received regular experimental authorities within the last five years. Very frequently, significant effort has been required to obtain the authorization of these experimental authorizations and a follow-up authorization may be necessary. Alternatively, the FCC could use the regular now expired authorization to be used and modified to specify follow-up experimental activities, particularly, if the modified authorization is to be in a rural setting.

While the above could fit within the proposed product development or market trials, it is uncertain if this would be appropriate when equipment under test is not directly licensed such as an antenna and does not fit Part 2, Part 5 or Part 15 of the FCC Rules.

Further, CDE urges the Commission to begin these proposed rule changes under a pilot program. It is mandatory that if interference is detected or suspected that the FCC has the ability to contact responsible individual(s) immediately. This immediate contact should be available regardless of weekends and holidays and contact failure should disqualify the organization for a 6-month period.

The FCC has limited resources, and often the consumer does not identify the interference or its source. Therefore, in order not to tax FCC resources, rigid contact enforcement should be made.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Donald G. Everist", written over a horizontal line.

Donald G. Everist

DATE: March 10, 2011