

Specific Comments on

47 CFR Part 15

[ET Docket No. 10-26; FCC 11-133]

Definition of Part 15 Auditory Assistance Device

AGENCY: Federal Communications Commission.

ACTION: Proposed rule.

These comments are made by Chris Redish, Owner, A Bridge Between Nations, Inc. a provider of simultaneous interpretation and assistive listening equipment, in support of the proposed change that would allow the 72-76MHz band to be used for simultaneous interpretation.

Section 10:

- 1) Potential benefits of allowing simultaneous interpretation in the 72-76MHz band:
 - a) increased competition in simultaneous interpretation rentals – reducing the price and therefore the availability of interpretation and assistive listening at conferences. The current legally-acceptable alternative to the 72MHz band is the 216MHz band, which only supports a maximum of 3 channels. Many events need interpretation in more than 3 languages, which under current regulations, requires infrared equipment. Infrared equipment is a lot more expensive, and unsuitable for large venues due to the very limited range of the emitters used.
 - b) as the Commission suggests, greater availability of inexpensive interpretation equipment will lead to great availability of assistive listening at conferences, since the additional cost to add an assistive listening channel are minimal to the conference organizer.
- 2) We agree with the Commission that the addition of simultaneous interpretation to the 72 MHz band will not increase costs to the public. In fact, we believe it will reduce costs by increasing competition.

Section 13:

Will increased usage of the 72 -76 MHz band cause interference to licensed users in, and adjacent to, the band?

I am a supplier of simultaneous interpretation and assistive listening equipment, not an electronic engineer, so I cannot comment with certainty, however, it seems to me that the very low power allowed by the FCC for Part 15 72-76 MHz transmitters is very unlikely to cause interference to any licensed user. Although some of the transmitters have a theoretical range of 1000 feet, they are rarely used outdoors where such a range might be attainable. In our experience, most events requiring interpretation take place in hotels, convention centers, stadiums, houses of worship, schools and court buildings, most of which have at least one brick or cinder block wall which serves to rapidly attenuate the VHF signal, reducing the range to less than a hundred feet outside of the building. It seems unlikely that licensed users would be this close.

Section 14:

Much of the increase in usage of the 72 MHz band will occur in hotels, convention centers and stadiums. These are generally not in residential areas, so it seems unlikely that there would be a significant increase in FM noise affecting VHF television bands, which are presumably mostly

used in residential areas.

Section 15:

As noted above, we do not believe that out-of-band emissions are likely to be problematic. However, if the Commission decides to make a change to the limits, we would suggest that existing equipment should be grandfathered for the life of the equipment. If grandfathering of equipment was not allowed, then tens of thousands of churches, schools and other organizations that operate assistive listening equipment would be forced to replace their equipment at considerable cost. (It seems unlikely that modifying existing equipment would be economically feasible, and replacement would probably be the only course of action available if grandfathering were not allowed).

Section 16:

As noted above, we think that the use of 72 MHz equipment for simultaneous interpretation is unlikely to affect reception of VHF television channels.

Section 23:

Many small entities are engaged in the rental and sale of equipment for simultaneous interpretation. Under current FCC regulations, the only equipment that may be used for events with more than 3 languages (the technical limit on the number of channels that can be used with 216MHz equipment), is infrared. However, infrared equipment is expensive, and not well suited to events with large audiences, due to the limited range of the emitters. Consequently, the costs of simultaneous interpretation at large events is disproportionately high, and often well outside of the budget available to the conference organizer.

Opening up the 72 MHz band to simultaneous interpretation will allow small entities to compete with infrared equipment providers to offer interpretation at large events, bringing about a substantial cost reduction to the conference organizers.

There will also be a substantial benefit to organizations who wish to purchase their own simultaneous interpretation equipment. This includes many houses of worship, schools and court buildings. Currently, 72 MHz equipment is available at much lower prices than 216 MHz equipment. Allowing these organizations to purchase 72 MHz equipment for simultaneous interpretation will save them considerable amounts of money.

In conclusion, we support the proposed change, to allow the 72-76 MHz band to be used for simultaneous interpretation.

Thank you.

Chris Redish