

COHEN, DIPPELL AND EVERIST, P.C.

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

In the Matter of) WT Docket No. 12-69
Promoting Interoperability in the 700 MHz)
Commercial Spectrum; Interoperability)
of Mobile User Equipment Across Paired)
Commercial Spectrum Blocks in the)
700 MHz Band)

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 the Notice of Proposed Rulemaking (“NPRM”) released by the Commission on March 21, 2012. 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 Federal Communications Commission (“FCC”) seeks information of consumers of the Lower 700 MHz B and C Block licensees would be subject to objectionable interference.

The Lower 700 MHz spectrum (698-746 MHz) consists of segments--Lower A, B, C blocks as well as the Lower D and E blocks. The Lower A block is immediately adjacent to TV Channel 51. Domestically within the Continental United States are many high-powered TV Channel 51 operations with effective radiated power up to 1000 kW.

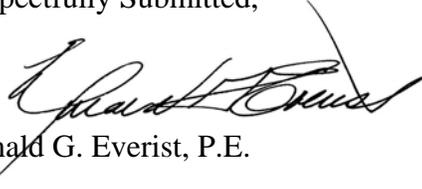
These comments focus on the due diligence that should have occurred by participants prior to participation in the 700 MHz auction. The full-powered DTV operations with their technical details of high-powered operation notwithstanding which UHF channel have been known publicly for many years. Also, the location of such high-powered DTV operations are a matter of public record. Therefore, this discussion should and must be on the new devices which are going to use Lower A, B, C blocks as well as the Lower D and E blocks. These new entrant devices must recognize and be designed to operate in the existing RF environment--interference as well as signal blocking.

To do otherwise invites a similar experience as the recent LightSquared-GPS saga in FCC IB Docket No. 11-109.

The other consideration which supports the necessity that new devices must have the ability to operate in the existing RF environment is if the FCC is successful in creating spectrum from its conduct of the incentive auction, the adjacent-channel TV band concerns by spectrum bidder no matter which combination, will be repeated if not successfully resolved.

Therefore, this firm urges the FCC to initiate and perform its own independent testing of possible new consumer devices that will operate in the Lower 700 MHz band to determine the technical requirements for these devices so that they can successfully operate in the existing RF environment.

Respectfully Submitted,



Donald G. Everist, P.E.

DATE: June 1, 2012