

Cohen, Dippell and Everist, P.C.

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

In the Matter of)
)
Wireless Telecommunications Bureau)
Seeks to Supplement the Record on the) GN Docket No. 12-268
600 MHz Band Plan)

LATE FILED

Reply Comments
on Behalf of
COHEN, DIPPELL AND EVERIST, P.C.

The following reply comments are respectfully submitted by the consulting engineering firm of Cohen, Dippell and Everist, P.C. (“CDE”) and is in response to the Public Notice (“Notice”) released by the Commission on May 17, 2013. CDE and its predecessors have practiced before the Federal Communications Commission (“FCC”) for over 75 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 discussion by various plans have been scrutinized as released in the “Official FCC Blog” by Ruth Milkman, Chief, Wireless Telecommunications Bureau¹ dated June 21, 2013.

¹One of the plans noted was not available.

None of the various plans that this firm has examined to date has taken into consideration the propagation path variability long recognized by the FCC such as Zone III (Section 73.699 of FCC Rules) and Zone I-A (Section 73.204 of the FCC Rules). There are unofficial propagation path variabilities in the paths Texas to Oklahoma; the Detroit to Cleveland over Lake Erie or the issue raised in the WHRO-DT and WBOC-TV² matter.

It is urged that the FCC take into consideration the propagation variability recognized and unrecognized by the FCC in its continuing deliberation of the Band Plan. Obviously these propagation paths in which variability routinely occurs will affect the so-called “split” and variable Band Plans.

Respectfully Submitted,

COHEN, DIPPELL AND EVERIST, P.C.



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President
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DATE: July 1, 2013

²File No. BLEDT-20020604AAB and BMPEDT-20000428ADG.