



**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION**

In the Matter of)	
)	
Office of Engineering and Technology)	ET Docket No. 13-26
Releases and Seeks Comment on Updated)	
OET-69 Software)	
)	
Expanding and Economic and Innovation)	GN Docket No. 12-268
Opportunities of Spectrum Through Incentive)	
Auctions)	

**COMMENTS OF
LOCUSPOINT NETWORKS, LLC**

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The following comments are submitted on behalf of the LocusPoint Networks, LLC (“*LocusPoint*”) in response to the Public Notice released by the FCC on February 4, 2013. These comments focus on the general usability of the domain file for repacking scenarios.

The proposed incentive auction of broadcast spectrum relies on the ability to repack broadcast stations. Consequently, a thorough and transparent understanding of feasible TV station repacking is essential to allowing stakeholders to test and incorporate accurate inputs into their analysis for the auction rulemaking and preparation for the ultimate auction process. The complexity and novelty of this auction, and the station repacking procedure, is widely known; however, there are measures the FCC can take to ameliorate informational grey areas and, thereby, facilitate a smooth auction process.

LocusPoint applauds the FCC for their efforts to develop a more user-friendly interference software program in accordance to the stipulations of OET Bulletin No. 69¹ and to make that software and its outputs publically available. LocusPoint also urges the FCC to release further information about the *TVStudy* outputs. In particular, the release of specific details about the fixed constraints found in the domain file would give parties further insight.

The technical appendix² released by the FCC, which describes the creation of the domain file, states that five types of fixed constraints are used in producing the domain file: Land Mobile, Land Mobile Waiver, Mexican allotments, Canadian allotments, and channel 37. We ask that the FCC release information detailing which of the above led to each of the specific channel constraints in the domain file. In the case of Canadian and Mexican allotments, information on the specific Canadian or Mexican station occupying the channel would also be helpful. This

¹ See, OET Bulletin No. 69, “Longley-Rice Methodology for Evaluating TV Coverage and Interference,” February 6, 2004, at http://transition.fcc.gov/Bureaus/Engineering_Technology/Documents/bulletins/oet69/oet69.pdf.

² See, “Technical Appendix: Constraint File Generation,” at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-13-1613A2.pdf.

information will allow parties to better understand repacking fixed constraints and thereby better evaluate feasible repacking scenarios and prepare for the incentive auction.