

Cohen, Dippell and Everist, P.C.

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

In the Matter of )  
 )  
Wireless Telecommunications Bureau )  
Seeks Comment on AT&T Request for ) WT Docket No. 14-107  
Waiver to Permit Power Spectral Density )  
Model for 800 MHz Cellular Operations )  
in Vermont Market )

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 Public Notice released by the Commission on July 16, 2014. 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.

AT&T Services, Inc. on behalf of AT&T, Inc. and its subsidiaries (“AT&T”) seek a limited waiver of Section 22.913 of the Federal Communications Commission’s Rules. The AT&T filing indicates that the ability to restate to include power spectral density (“PSD”) as an alternative to that specified by the current rules per Section 22.913(a) would assist in the deployment of advanced digital broadband modulation schemes.

However inspection of waiver request by AT&T does not yield how if permitted AT&T would deploy this limited waiver. It is noted that four of the six sites specified in the license are within 72 km of the common Canadian-U.S. border.

The AT&T filing also alludes to its analysis of the potential interference effects on public safety receivers. The AT&T filing states the following:

“The study results also showed that a power spectral density limit based on a maximum power level of 2500 watts (2500 watts/10 MHz or 250 watts/MHz for non-rural areas) and 5000 watts (5000 watts/10 MHz or 500 watts/MHz in rural areas) should exhibit about the same or less interference impact as existing deployment.”

The operative word is should not will.

Further the sites described in the license presumed to be used in the limited waiver area have generally low structure heights<sup>1</sup> have maximum power levels that should be subject to RFF analysis at 2 meters above ground. Examination of the filing is silent how RFF exposure compliance would be achieved.

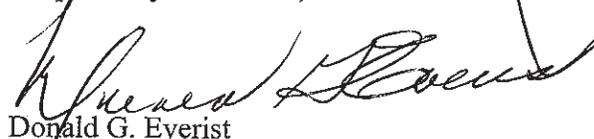
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<sup>1</sup>From 15.5 meters to 46.6 meters

Conclusion

Based on the AT&T submissions, the FCC is urged to consider the current and future impact to public safety and also consider whether or not the proposal raises radio frequency environmental concerns.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Donald G. Everist", is written over the typed name. The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Donald G. Everist

Date: August 5, 2014