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	)	

Reply Comments
on Behalf of
Cohen, Dippell and Everist, P.C.

These reply comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE"). 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.

This firm has examined the only other comment filed in WT Docket No. 14-107 regarding limited waiver of Section 22.913 of the FCC Rules by AT&T, Inc. and its subsidiaries ("AT&T"). Those comments were filed by Robert F. Gonsett ("Gonsett")[1]. That filing provides

[1]*Comments of Robert F. Gonsett, Consulting Radio Engineer, in WT Docket 14-107* dated August 4, 2014

an excellent example of the unintended consequences of unbridled nature of increases in either effective radiated power ("ERP") and/or power spectral density ("PSD") by the facilities that are governed by Section 22.913 of the FCC Rules. As discussed below, the long-term and widespread effects of the increase in power on the permitted adjacent frequency operations are not yet known.

The example in comments filed by Linley Gumm and Charles Rhodes in ET Docket No. 14-14, GN Docket No. 12-268[2] ("Gumm and Rhodes") on Page 4, under the heading "Wireless Base Station to DTV Interference (Case 3)" provide results based on laboratory measurements of a multitude of DTV set top converters, 2005-2006 DTV receivers and many recent DTV (2013) receivers. While these laboratory receiver tests are not directly applicable to those that AT&T is requesting, it does shed a light that such operations have significant interference potential to existing operations in adjacent bands. This interference potential could manifest itself in AT&T's proposed operation. Therefore, requests such as AT&T's proposed operation need to be subject to intense scrutiny before limited waivers of Section 22.913 of the FCC Rules are permitted.

Conclusion

Both the Gonsett and Gumm and Rhodes filings provide ample indication that the FCC

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[2]*In the Matter of Office of Engineering and Technology Seeks to Supplement the Incentive Auction Preceding Record Regarding Potential Interference Between Broadcast and Wireless Services, ET Docket No. 14-14, GN Docket No. 12-268* "Comments of Linley Gumm and Charles Rhodes to the Public Notice" dated February 24, 2014

must exercise deliberate caution before permitting any increase in ERP/PSD in situations as advanced by AT&T.

Respectfully Submitted,

Donald G. Everist

Date: August 15, 2014