

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON DC 20554-0001

IN THE MATTER OF:

REVISIONS TO BROADCAST AUXILIARY SERVICE RULES IN  
PART 74 AND CONFORMING TECHNICAL RULES FOR  
BROADCAST AUXILIARY SERVICE, CABLE TELEVISION  
RELAY SERVICE, AND FIXED SERVICES IN PARTS 74, 78,  
AND 101 OF THE COMMISSION'S RULES

ET DOCKET NO.  
01-75

TELECOMMUNICATIONS INDUSTRY ASSOCIATION, PETITION  
FOR RULE MAKING REGARDING DIGITAL MODULATION FOR  
THE TELEVISION BROADCAST AUXILIARY SERVICE

RM-9418

ALLIANCE OF MOTION PICTURE AND TELEVISION  
PRODUCERS, PETITION FOR RULE MAKING REGARDING  
LOW-POWER VIDEO ASSIST DEVICES IN PORTIONS OF THE  
UHF AND VHF TELEVISION BANDS

RM-9856

REPLY COMMENTS OF

NATIONAL SPECTRUM MANAGERS ASSOCIATION

ON THE NOTICE OF PROPOSED RULEMAKING

The National Spectrum Managers Association [NSMA] respectfully submits the following Reply Comments in the above-captioned proceeding.

The NSMA, established in 1984, is a voluntary organization made up of individuals who serve as microwave radio/wireless and satellite frequency coordinators, licensees, and manufacturers. The role of the Association is to supplement the Commission's coordination rules with procedural and technical recommendations developed in an open forum of coordinators, licensees, and manufacturers. The NSMA's objective is to make the frequency coordination process more efficient and effective.

In light of this desire to improve the coordination efforts and the resulting improvement in spectrum utilization, the NSMA has a number of concerns with respect to the Comments that

were filed in response to the Notice of Proposed Rule Making [“Notice”] released by the Commission on March 20, 2001.

The Society of Broadcast Engineers [“SBE”] stated in their comments<sup>1</sup> that the frequency coordination for fixed, point-to-point links should be required but that TV Pickup stations “should be exempt from this requirement, as such mobile/itinerant operations are too dynamic to be subject to a requirement for a written frequency coordination exhibit.”

This appears to indicate a misunderstanding on the part of SBE relating to the requirements of Part 101 coordination procedures. Part 101 coordination procedures do not mandate written exhibits or the exchange of coordination data in written or letter form. The most important aspect of a Part 101 coordination is the notification and response action on the part of the participants. If the parties agree, the coordination may be completed verbally and arrangements for itinerant operations may even be completed in advance prior to knowing the particular links to be used.

As we understand the present method of coordinating ENG<sup>2</sup> operations in a given area, a licensee will have a “home channel” that has been pre-coordinated for unlimited use in that area and that use of any other channel will require coordination with the licensee who utilizes that other channel as their “home channel”. Part 101 coordination procedures do not preclude this type of coordination/operation so long as **all** of the parties in a given area have agreed in advance to the arrangements, the specific allowable operating areas are agreed to so that adjacent areas will not be affected, and that any new parties eligible for operation in a given area will be advised and their response<sup>3</sup> received.

Interference can be caused by any facility regardless of its operating status: fixed, mobile, itinerant, or experimental. Part 101 frequency coordination procedures of notification of all affected parties and their response is the best way to ensure maximum utilization of the spectrum and interference free operation. As noted, these arrangements can be made in advance to allow for the same interference free operation of mobile and itinerant users. The

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<sup>1</sup> At 8 through 10

<sup>2</sup> Electronic News Gathering

<sup>3</sup> Or their failure to respond within the required waiting period

only requirement is that all of the participants in a given area, and the nearby areas if appropriate, have been a party to the notification and response activity.

The NSMA extends a welcome to all members of the microwave community to aid them in implementing an effective and efficient coordination process. The NSMA requests that the rules be modified so that Part 101 type frequency coordination will be the standard.

By: \_\_\_\_\_

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