

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

In the Matter of	)	
	)	
Improving Public Safety Communications in the 800 MHz Band	)	WT Docket No. 02-55
	)	
Consolidating the 900 MHz Industrial/ Land Transportation and Business Pool Channels	)	
	)	
Amendment of Section 2.106 of the Commission's Rules to Allocate Spectrum at 2 GHz for use by the Mobile-Satellite Service	)	ET Docket 95-18
	)	
Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, including Third Generation Wireless Systems	)	ET Docket No. 00-258
	)	
Flexibility for Delivery of Communications by Mobile-Satellite Service Providers in the 2 GHz Band, the L-Band, and the 1.6/2.4 GHz Bands	)	IB Docket No. 01-185
	)	

To: The Commission

**Comments of the Society of Broadcast Engineers, Inc.**

The Society of Broadcast Engineers, Incorporated (SBE), the national association of broadcast engineers and technical communications professionals, with more than 5,000 members world wide, hereby respectfully submits its comments in support of the *Joint Proposed BAS Relocation Plan* jointly filed on May 3, 2004, by the Association of Maximum Service Television, Inc. ("MSTV"), by the National Association of Broadcasters ("NAB"), and by Nextel Communications, Inc. ("Nextel").

**I. SBE Fully Supports the Joint Proposed BAS Relocation Plan**

1. This is an excellent proposal that would solve the three major problems to the transition plan adopted in the ET Docket 95-18 Third Report & Order (R&O), and which were the basis for the SBE Petition for Reconsideration to that R&O. Namely, it would:

**SBE Comments in Support of *Joint Proposed BAS Relocation Plan*  
WT Docket 02-55; ET Docket 95-18; ET Docket 00-258; IB Docket 01-185**

1A. Assure far more timely financial reimbursement for all TV markets, as opposed to just the top-30 TV markets.

1B. Resolve the problem of smaller TV markets still using the "old" band plan with analog radios adjacent to a Top-30 TV market using the new band plan with digital radios.

1C. It would significantly shorten the transition period for the major TV markets where Nextel would elect to introduce its new service to 18 months, and it would halve the transition period for all remaining TV markets, from five years (60 months) to just 30 months.

2. Accordingly, SBE fully supports the *Joint Proposed BAS Relocation Plan* and affirms its willingness and availability to work with MSTV, NAB and Nextel to assist with technical coordination issues for transitioning TV markets from the old to the new 2 GHz TV Broadcast Auxiliary Service (BAS) channel plans.

**II. Summary**

3. SBE is pleased to lend its support to the *Joint Proposed BAS Relocation Plan*. It is well-crafted and would solve the pending problems involving 2 GHz TV BAS operations. SBE accordingly urges the Commission to adopt the *Joint Proposed BAS Relocation Plan* forthwith.

Society of Broadcast Engineers, Inc.

/s/ Ray Benedict, CSRE  
SBE President

/s/ Dane E. Ericksen, P.E., CSRTE  
Chairman, SBE FCC Liaison Committee

/s/ Christopher D. Imlay, Esq.  
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