

**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
IB Docket 02-364, MSS ATC	Sept 8, 2004, SBE Petition for Reconsideration, proposing to re-farm the 2.5 GHz TV BAS band to three 12-MHz wide digital channels.
ET Docket 04-37, BPL	June 1, 2004, SBE reply comments, broadband over power lines (BPL) because of the interference 1.705–80 MHz digital signals on un-shielded, non-twisted pairs overhead power lines would cause to licensed services using that same spectrum.
ET Docket 03-108, Cognitive Radios	June 1, 2004, SBE reply comments.
WT Docket 02-55, 2 GHz SMR (Nextel)	May 7, 2004, SBE <i>ex parte</i> comments in support of the May 3, 2004, MSTV/NAB/Nextel <i>Joint Proposed BAS Relocation Band Plan</i> (would re-farm all 2 GHz TV BAS to 12-MHz wide digital channels, as opposed to just TV BAS in the top-100 TV markets, with TV BAS in markets 101 to 216 having to wait up to five years for reimbursement).
ET Docket 03-108, Cognitive Radios	May 4, 2004, SBE comments opposing six-fold (8 dB) higher power spread spectrum IEEE 802.11x Part 15 "wifi" devices at 2,400–2,483.5 MHz. The comments also opposed extending 2,483.5–2,500 MHz (grandfathered ENG Channel A10) to Part 15 wifi devices.
ET Docket 03-237, Noise Temperature Criteria for Part 15 Devices	SBE comments filed on April 5, 2004. The comments oppose higher powered Part 15 devices for the 13 GHz TV BAS band.
RM-10836, EVSS Emergency Vehicle Signaling System	March 31, 2004, SBE reply comments pointing out that ADiCorp did not even file comments in support of its own rule-making, and that no technical filings supported the rulemaking, but that several filings by technically knowledgeable parties (including SBE) opposed the rulemaking.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
IB Docket 01-185 Terrestrial MSS	March 30, 2004, SBE reply to the Globalstar Opposition to the April 2003 SBE Petition for Reconsideration of the February 2003 ET 01-185 R&O. The SBE reply pointed out that maintaining three TV BAS channels at 2.5 GHz (A8, A9 and grandfathered A10) will require converting all three channels to digital to keep a three-channel capability in just 33.5 MHz of spectrum.
ET Docket 03-254 Frequency Coordination rules for 7 GHz MSS uplinks and downlinks, and 13 GHz Gateway uplinks, vs. terrestrial 7 & 13 GHz TV BAS links, CARS links, and POFS links.	SBE Reply comments filed March 18, 2004.
ET Docket 95-18, MSS	Joint NAB/MSTV/SBE March 15, 2004, filing responding to various oppositions to the NAB/MSTV, and SBE, Petitions for Reconsideration of the ET 95-18 Third R&O, giving just the top-30 TV market broadcasters up-front compensation for vacating 2 GHz ENG Channels A1 and A2.
ET Docket 03-254 Frequency Coordination rules for 7 GHz MSS uplinks and downlinks, and 13 GHz Gateway uplinks, vs. terrestrial 7 & 13 GHz TV BAS links, CARS links, POFS links.	SBE comments filed March 3, 2004. SBE opposes giving MSS uplinks/downlinks "full arc, full spectrum" protection. Believes this constitutes "spectrum warehousing," which is explicitly prohibited by Section 309(j)(4)(B) of the Communications Act. Proposed adoption of 150-km radius growth zones around the top-100 TV markets, to ensure no preclusive impact by MSS downlinks.
RM-10836, EVSS Emergency Vehicle Signaling System	February 12, 2004, SBE comments opposing the establishment of a Part 90 EVSS system, allowing emergency vehicles to simultaneously transmit warning messages on <i>all</i> AM and FM channels.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
ET Docket 95-18, MSS	January 7, 2004, SBE Petition for Reconsideration of the ET 95-18 Third R&O. Provided MRC D/U ratio study for finalized band plan adopted in the Third R&O, showing impossibility of simultaneous ENG operations in the same area using the old (17 MHz wide analog channels) and new (12 MHz wide digital channels) band plans.
ET Docket 00-258, Fourth NPRM DoD uplinks at 2 GHz	December 1, 2003, SBE Reply comments. Pointed out incorrect coordinates for some NWS and NASA uplinks already sharing the 2 GHz TV BAS band.
ET Docket 00-258, Fourth NPRM DoD Uplinks at 2 GHz	November 3, 2003, SBE comments opposing high-power DoD uplinks access to the refarmed 2,025–2,110 MHz TV BAS band. The SBE comments pointed out erroneous geographic coordinates for several of the proposed Dod uplink sites.
Safety Cast Experimental STA WB9XTT	July 30, 2003, SBE opposition to the Safety Cast Corporation application for an Experimental STA to transmit on all FM channels from emergency and other vehicles.
ET Docket 00-258, 3G	SBE reply comments to the ET 00-258 Third NPRM filed on April 28, 2003.
ET Docket 00-258, 3G	SBE comments to the ET 00-258 Third NPRM filed on April 14, 2003.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
ET Docket 01-75 Revisions to the Part 74 BAS Rules	April 4, 2003, SBE Request for stay of the PCN frequency coordination requirement scheduled to go into effect on April 16, 2003. Six-month stay, until October 16, 2003, granted on April 15, 2003.
IB Docket 01-185 Terrestrial MSS	SBE Petition for Partial Reconsideration of the February 10, 2003, IB 01-185 R&O, concerning grandfathered ENG operations on former TV BAS Channel A10 (2,483.5–2,500 MHz) filed on April 4, 2003.
ET Docket 01-75 Revisions to the Part 74 BAS Rules	SBE Petition for Partial Reconsideration of the November 13, 2002, R&O filed on April 4, 2003.
ET Docket 01-75 Revisions to the Part 74 BAS Rules	August 19, 2002, SBE letter to Congressman Tauzin regarding lack of FCC action allowing digital modulation for TV & aural STL microwave links.
CS Docket 99-250 PCO Access to the 13 GHz CARS Band	August 15, 2002, SBE ex parte filing in support of the July 29, 2002, Disney/NAB Petition for Reconsideration of the May 21, 2002, CS 99-250 R&O.
WT Docket 00-32 4.9 GHz TVDLs	July 23, 2002, SBE ex parte filing in support of the MRC & LASD reconsideration petitions requesting that airborne police operations be allowed at 4.9 GHz, plus a request that if airborne operations are allowed that public safety access to the 2.5 & 6.5 GHz TV BAS bands be phased out.
ET Docket 02-135 Spectrum Policy Task Force	July 8, 2002, SBE comments pointing importance of BAS frequencies and compatible vs incompatible sharing of BAS spectrum.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
ET Docket 98-142 7 GHz MSS Feeder Downlinks	May 10, 2002, SBE Petition for Reconsideration of the February 7, 2002, R&O, regarding Part 101 frequency coordination requirements and “first in time” priority rights for pre-existing 7 GHz TV BAS links and TV Pickup stations.
ET Docket 01-75 Revisions to the part 74 BAS Rules	May 8, 2002, SBE letter to FCC Chairman Michael Powell regarding lack of action to allow digital modulation for TV & aural STL microwave links
WT Docket 02-55 2 GHz SMRs	May 6, 2002, SBE comments regarding the proposal to create a 1,990–2,025 MHz allotment for SMRs in exchange for re-farmed 800 MHz spectrum to reduce interference to 800 MHz public safety operations.
“Part 14” Petition for Rulemaking Governing the Sale and Distribution of RF Devices Not Qualifying for Part 15 Unlicensed Operation	First draft circulated on February 19, 2002; second draft circulated on March 3, 2002.
EB Docket 01-66 Revisions to the Part 11 EAS Rules	January 2, 2002, SBE comments responding to the NCTA and MAP ex parte filings regarding EAS decoders for small cable systems and LPFM stations.
IB Docket 01-185 Terrestrial MSS	November 13, 2001, SBE reply comments
ET Docket 00-258 Third Generation Wireless Services (“3G”)	November 9, 2001, SBE reply comments
IB Docket 01-185 Terrestrial MSS	October 19, 2001, SBE comments regarding interference potential to TV BAS by an ancillary terrestrial component (“ATC”) for MSS
ET Docket 00-258 Third Generation Wireless Services (“3G”)	October 19, 2001, SBE comments regarding reallocation of 2008-2025 MHz from MSS to 3G



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
ET Docket 01-75 Revisions to the Part 74 BAS Rules	August 7, 2001, SBE reply comments.
EB Docket 01-66 Revisions to the Part 11 EAS Rules	July 16, 2001, SBE reply comments.
ET Docket 01-75 Revisions to the Part 74 BAS Rules	July 9, 2001, SBE comments supporting digital modulation for all TV BAS bands plus a wide range of other Part 74 issues.
EB Docket 01-66 Revisions to the Part 11 EAS Rules	June 11, 2001, SBE comments proposing revisions and refinements to the EAS Rules.
GN Docket 01-74 Reallocation of TV Channels 52-59	May 14, 2001, SBE comments proposing continued use of TV Channels 52-59 for Low Power Auxiliary devices on a secondary basis and not subject to spectrum auctions.
ET Docket 98-206 FNRPM NGSO FSS Gateway uplinks in the 13 GHz TV BAS/CARS bands	March 12, 2001, SBE comments regarding licensing policies for NGSO FSS Gateway uplinks sharing the 13 GHz TV BAS/CARS bands
“SBE frequency coordination” clause to be placed on OET experimentals and STAs	February 12, 2001, email to Mr. Carl Huie of OET regarding suggested wording for “SBE” coordination clause to be placed on OET experimentals and STAs authorizing operations on BC or BAS frequencies; establishment of toll-free SBE telephone number in support of this license/STA condition.
Letter to OET regarding “prior coordination” clause for OET experimentals or STAs authorizing operation on BC or BAS freqs.	February 2, 2001, letter to Mr. James Burtle, Chief, Experimental Licensing Branch, OET
Report to SBE President regarding eligibility of non-broadcast entities such as NFL, Stanford University, et al for Part 74 low power auxiliary wireless communication systems	January 21, 2001, letter report to Andy Butler



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
Letter to House Telecom Subcommittee regarding digital modulation (RM-9418)	October 18, 2000, SBE letter to The Honorable W. J. "Billy" Tauzin, Chairman, Subcommittee on Telecommunications, regarding lack of FCC action on RM-9418
Letter to OET regarding "prior coordination" clause for OET experimentals or STAs authorizing operation on BC or BAS freqs.	October 12, 2000, letter to Mr. James Burtle, Chief, Experimental Licensing Branch, OET
Letter to MMB regarding digital modulation (RM-9418)	September 18, 2000, SBE letter to Mr. Roy Stewart, Chief, MMB, requesting immediate action on the March 1998 EIA/TIA Petition for Rulemaking proposing to allow digital modulation in all of the TV BAS microwave bands.
Petition for Partial Reconsideration ET Docket 95-18 (MSS)	September 5, 2000, SBE Petition for Partial Reconsideration of the July 3, 2000, Second R&O/MO&O to ET Docket 95-18. SBE requests continuing eligibility for reimbursement until such time as the FCC Rules are changed to allow digital modulation at 2, 2.5, 7 and 13 GHz. SBE also proposes certain technical refinements to the center frequencies and channel widths of the re-farmed 2 GHz ENG channels, plus other unresolved issues.
Part 101 Update (WT Docket 00-19)	SBE comments filed on July 18, 2000. SBE urges creation of a TVDL service at 1.7 GHz for police use, to provide relief for existing shared use of 2.5 GHz frequencies. SBE also urges that digital modulation be allowed in the 2.5 GHz TV BAS band, plus other technical issues involving TV Pickups in the 2.5 GHz band (ENG Channels A8, A9 and A10; (grandfathered only on A10)).
Wireless Video Assist Devices on Un- Used VHF and UHF Television Channels (RM-9856)	SBE opposition comments filed on May 23, 2000. There are NO "un-used" television channels any more + this service would be ripe for "cut & burn" rogue operation.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

Item	Status
Part 74 “clean-up” NPRM (derivate of RM-9418) (Digital TV STLs, <i>et al</i> )	May 2, 2000, multi-page letter to Mr. Steve Linn of PRB listing 12 items that should be included in an anticipated Part 74 “clean-up” rule making.
Class A TV (MM Dockets 00-19/99-292)	SBE reply comments filed on February 28, 2000.
Class A TV (MM Dockets 00-10/99-292)	SBE comments filed on February 10, 2000.
NGSO FSS “Gateway” stations (ET Docket 98-206 )	SBE filed on January 12, 2000, in response to a joint <i>ex parte</i> filing by SkyBridge and FWCC. (SBE has filed comments to this proceeding on three prior occasions; it now appears that the come back to life).
2 GHz MSS (Loss of 2 GHz ENG spectrum) (ET Docket 95-18)	In response to a December 8, 1999, telephone call from an OET staffer, indicating that an Order to the Third NPRM was imminent, and that guidance was needed on which TV markets should be considered as having Category I or Category II ENG use (as defined in earlier SBE comments), an unofficial email was sent to OET on December 10, 1999, the indicated deadline, suggesting market criteria.
RM-9719 ERDS Ch. 200 87.9 MHz	SBE comments filed October 14, 1999, opposing the Federal Signal Corp. Petition for Rule making to establish the Emergency Radio Data System on 87.9 MHz, due to interference to TV Channel 6 stations and to FM Channel 201 NCEFM stations, as well as numerous other problems with the proposed system.
LAC R for DR on 2.5 GHz	SBE comments opposing the Sept. 1, 1999, Request for Declaratory Ruling filed by LA County, <i>et al</i> , filed on October 6, 1999. SBE position is that interpretations desired by LAC are inappropriate and would constitute <i>de facto</i> reallocation of the 2.5 GHz band to public safety.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
LPFM (MM Docket 99-25)	SBE Comments filed September 7, 1999. SBE comments expressed concern about enforceability of reduced deviation or special emission masks for LPFM stations. Lack of current FCC enforcement of FM technical parameters documented based on statistical analysis of FCC violation notices for 1988 vs 1997 by Hallikainen and Friends.
PCO Access to the 13 GHz CARS Band (CS Docket 99-250)	SBE Comments filed on August 16, 1999. SBE proposes PCOs only be allowed access to the 13 GHz CARS on a secondary basis. SBE opposes elimination of the 13.15–13.20 GHz reservation for TV Pickup stations within 50 km of the top-100 television markets.
MSS Service Rules (IB Docket 99-81)	SBE Reply Comments filed on July 29, 1999.
MSS Service Rules (IB Docket 99-81) premature and pre-judging the	SBE Comments filed June 24, 1999. SBE opposed the rule making as grossly outcome of ET Docket 95-18 in favor of MSS.
NGSO FSS Systems Operating in the 13 GHz TV BAS Band ("Gateway" uplinks) (ET Docket 98-206)	SBE Reply Comments filed March 29, 1999. SBE urges that Gateway uplinks only be protected for frequencies actually in use, as opposed to all possible frequencies.
2 GHz MSS (ET Docket 95-18)	SBE Reply Comments filed March 5, 1999. Alternative proposal for seven 14.3-MHz wide channels in lieu of seven 12.1-MHz wide channels offered.
TIA Petition to Allow Digital Modulation in the 2, 2.5, 7 and 13 GHz TV BAS Bands plus Other Changes (RM-9418)	SBE comments in support of TIA Petition filed March 5, 1999. SBE urges FCC to adopt policy to immediately allow digital modulation
NGSO FSS Systems Operating in the 13 GHz TV BAS Band ("Gateway" uplinks) (ET Docket 98-206)	SBE Comments filed March 2, 1999. SBE points out that the 13 GHz TV BAS band is heavily used and supports 100-km preclusion zone around top-50 population centers.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
2 GHz MSS (ET Docket 95-18)	SBE Comments filed February 3, 1999. Detailed rebuttal of MSS claims that broadcasters can easily live with 85 rather than 120 MHz of 2 GHz "ENG" spectrum by converting to digital. MSS must pay all "reasonable and prudent" relocation costs.
TIA Petition for Rulemaking to allow digital modulation in the 2, 2.5, 7 and 13 GHz TV BAS bands (Petition filed March 6, 1998)	SBE files in support of TIA Petition on November 16, 1998. SBE urges the FCC to assign a rule making number proceed forthwith with a rule making.
7 GHz MSS Downlinks (ET Docket 98-142)	SBE Reply Comments filed on October 26, 1998.
7 GHz MSS Downlinks (ET Docket 98-142)	SBE Comments filed on September 21, 1998.
WRC-99: MSS access to 455-456 MHz (ET Docket 97-214 )	SBE comments concerning WRC-99 and MSS access to 455-456 MHz filed June 30, 1998
Request for Declaratory Ruling on Unattended Operation (MM Docket 94-130)	SBE files Request for Declaratory Ruling on certain aspects of the new Unattended Operation rules on April 7, 1998.
2 GHz MSS (ET Docket 95-18)	SBE response to COMSAT March 18, 1998, <i>ex parte</i> comments filed April 29, 1998. Many of the COMSAT claims regarding broadcasters' use of the 2 GHz "ENG" band shown to be inaccurate.
Second EAS FNPRM FO Docket 91-171	SBE comments filed on April 20, 1998
NWS EAS Petition RM-9215	Comments filed February 13, 1998, in regard to December 22, 1997, letter from NWS to the FCC (accepted by the FCC as a Petition for Rulemaking).
Request for Declaratory Ruling MM Docket 94-130 (Unattended Operation)	SBE Request for Declaratory Ruling regarding certain aspects of the 1995 R&O on unattended operation of broadcast stations. Petition filed on April 7, 1998.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
Mandatory PCN for BAS RM-_____	SBE Petition for Rulemaking DRAFTED January 19, 1998, and circulated to SBE Frequency Coordination Committee and to SBE FCC Liaison Committee members. Further action subject to outcome of SBE PILOT program.
MSS Access to the 455-456 MHz RPU Band; ET Docket 97-214	SBE Reply Comments filed on December 22, 1997.
MSS Access to the 455-456 MHz RPU Band; ET Docket 97-214	SBE Comments filed on December 1, 1997.
SkyBridge Petition RM-9147 also ET Docket 98-206)	SBE comments concerning February 1997 SkyBridge application, and the (see July 3, 1997, SkyBridge Petition for Rule Making, to allow sharing of the 13 GHz TV BAS band by User Terminal stations communicating with low Earth orbit satellites, filed on October 8, 1997.
SBE EAS Petition RM-9156	SBE Reply Comments filed on October 7, 1997.
SBE EAS Petition RM-9156	August 14, 1997, SBE Petition for Rule Making to make improvements to Part 11 of the FCC Rules (EAS). Placed on Public Notice on August 22, 1997.
ET Docket 95-18, MSS	July 20, 1997, DRAFT SBE Response Reply of the MSS Coalition to Opposition to Petition for Partial Reconsideration [proposed filing on hold pending clarification of Budget Reconciliation impact; see subsequent April 29, 1998, SBE filing to ET 95-18.]
ET Docket 95-18, MSS	June 20, 1997, SBE comments to the Docket 95-18 FNPRM, concerning MSS, reallocation of 2 GHz BAS frequencies, implementation dates, and reimbursement obligations.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
ET Docket 95-18, MSS	June 19, 1997, SBE filing opposing MSS Petition for Partial Reconsideration, requesting that the FCC overturn its decision to grant 20 MHz of offsetting 2 GHz BAS spectrum in compensation for the loss of 25 MHz of ENG spectrum to MSS, and to require MSS to pay all relocation costs.
Marrangoni letter Re: Prior Coordination	December 24, 1996, SBE letter to Mr. Paul Marrangoni, Chief, Exp. Licensing Branch, OET, FCC, thanking him, and confirming new FCC policy, that Exp. Licenses that authorize operation on Broadcast or Broadcast Auxiliary frequencies will include a PRIOR COORDINATION requirement.
Wireless Fixed Access Local Loop Services ("WFA-LL") Proposed using 2 GHz band frequencies for final link to individual residences and businesses. RM 8837.	Petition filed with FCC on June 10, '96. No FCC action, so far. Indirectly threatens 2 GHz ENG (1,990-2,110 MHz and 2,450-2,483.5 MHz) because it would preclude 2 GHz spectrum now available on a case-by-case "spill over" basis. SBE opposition comments filed on December 23, 1996. Petition DISMISSED by FCC on August 5, 1997.
Public Safety Spectrum Requirements Through the Year 2010 ("PSWAC") WT Docket 96-86	Proposes huge "raids" on Broadcast and Broadcast Auxiliary frequencies, for re-allocation to Public Safety use. Public Safety Wireless Advisory Committee ("PSWAC") report found to contain several gross errors. SBE Reply Comments pointing out these errors filed on December 19, 1996. Issue is PENDING at the FCC.
Petition for Rule Making by NASA to codify existing informal sharing of 2 GHz ENG frequencies.	Formal SBE letter in support of NASA petition to IRAC sent July 3, 1996. Matter was considered at the October 8, 1996, IRAC meeting (IRAC Docket No. 30063). IRAC referred item to FCC on January 2, 1997, with positive recommendation. Item is PENDING at the FCC.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
MSS (ET Docket 95-18)	May 17, 1996, SBE Reply Comments to the Supplemental Comments of COMSAT Corporation.
More Flexible Standards for Part 74, Part 78, and Part 101 Directional Microwave Antennas ET Docket 96-35.	SBE comments filed April 26, 1966. Report & Order issued on January 17, 1997: FCC declined to issue updated list of frequency congested areas, as suggested by SBE. However, FCC did confirm that RX dishes not meeting Cat A or B criteria must accept any resulting IX.
High-Powered Part 15 Biomedical Telemetry Devices on Un-used VHF High Band and UHF Television Channels ET Docket 95-177	SBE comments opposing the proposal for greatly increased powers for unlicensed, Part 15 devices on "un-used" TV channels filed by SBE on May 16, 1996. R&O issued October 20, 1997. SBE warnings NOT heeded.
Radio Astronomy Coordination Zone for Arecibo Radio Astronomy Observatory in Puerto Rico. ET Docket 96-2.	SBE comments filed April 1, 1996. R&O issued October 15, 1997, adopting virtually all SBE recommendations.
Digital Audio Radio Services (DARS) General Docket 90-357/IB Docket 95-91	Joint SBE, Capital Cities/ABC Inc., MSTV, and NBC, Inc. filed on September 15, 1995. Comments propose allowing sharing of the 7 GHz TV B/C Auxiliary spectrum for DARS feeder uplinks only if certain frequency coordination requirements are made mandatory, and that any DARS use of these frequencies would be on a secondary basis to TV Broadcast Auxiliary uses. R&O released March 3, 1997. DARS 7 GHz feeder uplinks authorized on co-primary basis with 7 GHz TV B/C Aux.,. No site restrictions, but PRIOR COORDINATION requirement adopted.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
Possible Petition for Rule Making Make Evidence of Frequency MANDATORY	Free to proceed as a result of copying and distribution of frequency coordinator's maps to all 150 SBE-affiliated volunteer coordinators, courtesy of Al Byers of Metro Networks in Houston. Also prompted by March 3, 1994, BBS message from Charles Sears to John Poray.
WRC 95 IC Docket 94-31 ("MSS") Mobile Satellite Services date for 2 GHz MSS	Joint Comments of MSTV, NAB, ABC, CBS, NBC, PBS, RTNDA, and SBE, objecting to speeded-up implementation from January 1, 2005, to January 1, 1996. Late filing by MSS Joint Parties proposing 450-451 and 455-456 MHz RPU frequencies for MSS feeder and service uplinks. SBE rebuttal filing prepared, but before that document could be filed FCC issued a Report, on June 15, 1995. August 28, 1995, SBE letter to State Department, pointing out procedural irregularities at the FCC and arguing against sharing of RPU band without certain safeguards. December 14, 1995, FCC Order granting TRW until December 29, 1995, to file amended application for MSS feeder uplink. SBE Counsel attempting to obtain copy of TRW amendment.
Mobile Satellite Services (MSS) ET Docket 95-18	Joint Comments of MSTV, NAB, ABC, CBS, NBC, PBS, RTNDA, and SBE, objecting to plan to reallocate 35 MHz of 2 GHz ENG spectrum (Ch. A1 & A2, 1,990-2,025 MHz) to MSS, filed March 6, 1995. SBE-only Reply Comments filed June 21, 1995. R&O released. March 17, 1997, FCC news summary indicates that B/C'ers will get an additional 20 MHz of spectrum, from 2,110 to 2,130 MHz (above Ch. A7), to partially compensate for loss of 35 MHz of BA spectrum (ENG Channels A1 & A2). Channels A3 through A7, A7a, and A7b, will be narrowed from 17 to 15 MHz. MSS MUST PAY COSTS.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
Unattended Operation MM Docket 94-130	SBE Comments filed January 30, 1995, supporting FCC proposal to eliminate the requirement for licensed operators at broadcast stations, and to allow unattended operation, with certain caveats. Report and Order issued on October 23, 1995. Order substantially more deregulatory than suggested by SBE.
Return of below-5 GHz federal spectrum to the private sector ET Docket 94-32	SBE Reply Comments filed January 6, 1995, supporting MSTV Comments requesting allocation of 25 MHz of TV Broadcast Auxiliary spectrum at 4,660–4,685 MHz. Second R&O issued August 2, 1995: all below-5 GHz federal gov't. returned spectrum will be auctioned; none for TV B/C Auxiliary.
PCS Docket Gen. Docket 90-314	Participation in <i>Reply Comments</i> of the Joint Broadcast Parties, to comments received as a result of July 25, 1994, Joint Request for Clarification. OBJECTIONS DISMISSED.
PCS Docket Gen. Docket 90-314	Participation in <i>Joint Request for Clarification</i> to June 13, 1994 Memorandum Opinion and Order to Gen. Docket 90-314 (joint filing by MSTV, NAB, Capital Cities/ABC, CBS, Fox, NBC, PBS, RTNDA, and SBE. Objection to loss of 20-MHz “guard bands” above and below 2 GHz ENG band, with no obligation for PCS base stations to protect ENG 2 GHz receive sites.
Possible Petition for Rule Making Changes to RPU channel splits and to RPU use priorities	Triggered by letter from Dan Rau of Marti Electronics; Liaison Committee member’s comments generally negative. NO FILING PLANNED.
User Fees MD Docket 94-19	Comments filed April 7, 1994; SBE objected to B/C Auxiliary user fees and to one-time \$105 fee for holders of lifetime operator licenses or permits. SUCCESSFUL in eliminating a one-time \$105 Users Fee



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
FCC Adoption of ANSI/IEEE C95.1-1992 RFR Standard ET Docket 93-62.	Reply Comments filed April 25, 1994. FCC adopts "most restrictive" portions of ANSI and NCRP exposure guidelines; generally FIVE TIMES more restrictive for "uncontrolled" or "public" exposures.
FM Peak Modulation Issues MM Docket 93-225	Initial comments filed November 5, 1993; reply comments filed Dec. 15, 1993. PENDING.
Revised PRB Form 574	SBE comments filed November 1, 1993, in response to Sept. 23, 1993, FCC Notice asking for comments on proposed major revisions to Form 574. Form 574 SUPERSEDED by revised FORM 600 (Dec 94 version).
Wind Profiler Radars at 449.00 MHz ET Docket 93-59	SBE initial comments filed June 15, 1993. SBE reply comments filed July 15, 1993. PENDING.
"Processing of B/C Auxiliary Applications" Notice regarding April 21, 1993 meeting at Gettysburg to discuss Broadcast Auxiliary processing issues	SBE letter sent to FCC on April 8, FCC 1993. March 26, 1993, memo from Paul Lentz to all frequency coordinators requesting list of counties in coordination area; anticipated that maps will be prepared showing these coordination areas, with a list of coordinated counties
DARS use of 7 GHz TV Auxiliary Band	SBE Informal Objection to Loral Aerospace Holdings, Inc., Primosphere Limited Partnership, and Sky-Highway Radio Corporation DARS applications that proposed uncoordinated use of the 7 GHz TV Auxiliary band filed on April 9, 1993. See subsequent Docket 90-357 (DARS) comments.
Arecibo Observatory Notification Zone; RM-8165	SBE comments filed February 18, 1993. Subsequently issued as NPRM, ET Docket 96-2, on February 8, 1996; see separate entry for that docket.
NPRM and Further NOI on EBS FO Docket 91-171/91-301	SBE comments filed January 15, 1993. R&O issued December 9, 1994.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
DARS use of 7 GHz TV Auxiliary Band	SBE informal objection filed December 1, 1992. Objected to Satellite CD's proposed use of STL Channels B-7 and B-8 for uplinking. See subsequent Docket 90-357 (DARS) comments. See subsequent DARS rule making.
ET Docket 92-9: Redevelopment of Spectrum to Encourage Innovation Use of New Telecommunications Technologies	SBE comments filed June 1, 1992. Reply comments filed June 30, 1992. A major SBE victory: the 2 GHz ENG band was left intact.
FO Docket 91-171: Inquiry Into Possible Technical Improvements in Emergency Broadcast System	SBE comments filed March 30, 1992. Follow-up Further NOI and NPRM the issued; see above.
Improving the FM Licensing Process	SBE comments filed December 16, 1991; NPRM subsequently issued on November 21, 1991, as MM Docket 91-347. R&O issued July 16, 1992. Abolished "hard look" policy for FM applications.
3 GHz STL's Docket 90-5	SBE comments filed October 8, 1991; PR Favorable MO&O released Dec. 4, 1991; confirmed 23 GHz POFS links still available to broadcasters.
Personal Communications Services (PCS) Gen. Docket 90-314	Informal comments filed on April 11, 1991, in the form of a letter to Don Campbell at the FCC. Formal SBE comments filed on January 9, 1992. NPRM & Tentative Decision issued July 16, 1992. 2 GHz ENG band left intact!
NRSC-1 Labels for AM Radios	Draft petition sent to committee members March 15, 1991; no interest expressed by Liaison Committee members; no further action planned.
Frequency Coordinator's Eligibility Rule making Petition of frequency coordinating	Petition filed in November 1990; FCC action still PENDING. However, survey committees conducted in 1994/1995 showed little interest in applying for such licenses, if the FCC Rules were so amended. Therefore, no further effort is planned to "revive" this stalled Rule making.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 16, 2004**

<u>Item</u>	<u>Status</u>
RFR issues (Gen. Docket 88-387)	Request for Declaratory Ruling filed October 1, 1990; request DENIED on February 1, 1991.
State Licensing of Operators	Request for Declaratory Ruling filed on June 19, 1990; FCC action still PENDING.
"Congested Area" definition Rule Making MM Docket 90-500	Comments filed February 27, 1990; R&O released September 23, 1991. SBE proposal <i>not</i> adopted.
Aural STL Petition for Rule Making	SBE Petition for Rule Making filed January 23, 1990; DISMISSED without action on November 4, 1991.
CATV Technical Standards MM Docket 85-38 NRSC-1 & NRSC-2 Standards MM Docket 88-376	SBE comments filed December 12, 1988. R&O released March 4, 1992. SBE comments filed November 22, 1988; R&O released April 27, 1989.
TV Technical Standards MM Docket 88-114	SBE comments filed June 20, 1988; R&O released February 28, 1989.
Type Acceptance Issues MM Docket 87-552	SBE comments filed May 5, 1988; R&O released April 11, 1991.
NRSC-1 Standard MM Docket 87-267	SBE comments filed January 1988; Report released on November 16, 1988

