

**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

<u>Item</u>	<u>Status</u>
RM- CDBS to NAD83	August 10, 2007, Petition for Rulemaking to convert the CDBS to NAD83.
Clarity "Trucker TV"	July 30, 2007, SBE response to written presentation" of Clarity Media Systems regarding non-suitability of the 5.6 GHz Unlicensed National Information Infrastructure Devices (U-NII) devices.
MB Docket 93-177 AM directional arrays	July 23, 2007, SBE comments in support of proposal to allow computer modeling to verify the performance of AM directional arrays.
WT Docket 07-121 DREs for microwave links	July 19, 2007, SBE comments opposing the proposal by Wireless Strategies, Inc. to allow distributed radiating elements (DREs) for point-to-point microwave links subject to the prior coordination notice (PCN) process.
Clarity "Trucker TV"	June 19, 2007, SBE Opposite to Application for Review filed by Clarity Media Systems regarding the May 3, 2007, Media Bureau Order denying Clarity the waivers it needed for "Trucker TV" base stations in the 2 GHz TV BAS band.
ET 00-258 DoD uplinks at 2,025-2,110 MHz	April 16, 2007, THIRD SBE-DoD meeting, Las Vegas, NV.
WT 02-353 Service Rules for 1.7/2.1 GHz AWS Stations	April 4, 2007, Petition for Reconsideration of the March 8, 2007, WT Docket 02-353 R&O.
WC9XSK Experimental STA for 2.1 GHz AWS operations	April 3, 2007, SBE withdrawal of its Informal Objection, after successful negotiations with Ericsson regarding prior coordination with TV Pickup licensees and a "hot line" telephone number to be called in the event of interference (as occurred during Ericsson's experimental STA operations in Queens, NY).
WC9XSK Experimental STA for 2.1 GHz AWS operations	March 23, 2007, SBE Informal Objection to the Ericsson Inc. Parsippany, NJ, experimental STA application for operation in the AWS A-block at 2,110-2,120 MHz.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

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WT 02-55, 2 GHz TV BAS Transition	March 7, 2007, SBE declaration regarding progress towards the Sprint Nextel transitioning of the 2 GHz TV BAS band from 1,990-2,110 MHz to 2,025-2,110 MHz.
ET 04-356 Service Rules for 2.1 GHz AWS operations	NYC BAS/T-Mobile March 8, 2007, meeting about AWS-into-BAS interference.
ET 04-356 Service Rules for 2.1 GHz AWS operations	Chicago BAS/T-Mobile March 2, 2007, meeting about AWS-into-BAS interference.
ET 00-258 DoD uplinks at 2,025-2,110 MHz	SECOND SBE-DoD meeting, January 11, 2007, Las Vegas, NV.
MB Docket 06-189 Video Competition	December 29, 2006, SBE reply comments, rebutting the Clarity Media Systems ("Trucker TV") comments repeating false claim that long-haul truckers are an "underserved" community for video distribution purposes.
ET 00-258 DoD uplinks at 2,025-2,110 MHz	FIRST SBE-DoD meeting, November 8, 2006, El Segundo, CA.
Clarity "Trucker TV"	November 20, 2006, SBE <i>ex parte</i> filing responding to Clarity's DA 06-1664 reply comments.
Clarity "Trucker TV"	September 21, 2006, SBE filing, opposing the three re-filed Clarity "Trucker TV" 2 GHz CARS applications at Frazier Park, CA; North SLC, UT; and Ogden, UT, plus seven other cities.
FAA Docket 25002 Stricter EMI regulation	Anticipated September 11, 2006, filing, opposing stricter FAA EMI regulation (would impose duplicative filing requirements on broadcasters and would conflict with several FCC rules).
RM-11339 More MSS ATC spectrum	August 21, 2006, SBE comments opposing expansion of MSS ATC operations from 2,487.5-2,493 MHz (5.5 MHz of MSS ATC spectrum) to 2,483.5-2,500 MHz (16.5 MHz of spectrum, and all of grandfathered TV BAS Channel A10).
Letter to OET about "SBE clause" for experimental authorizations	August 3, 2006, letter to OET regarding "SBE clause" to be placed on all experimental licenses and experimental STAs that authorize operation on broadcast or BAS frequencies.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

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ET Docket 05-345 Wireless Mics for NPP operators IB Docket 02-364	July 31, 2006, White Paper on Nuclear Power Plant operators using Part 74 wireless mic frequencies. May 22, 2006, Petition for Reconsideration of the
MSS ATC	IB Docket 02-364 <i>Order on Reconsideration and Fifth MO&amp;O; and Third MO&amp;O; and Second R&amp;O</i> , regarding grandfathered TV BAS Channel A10 (2,483.5-2,500 MHz) operations and MSS ATC at 2,487.5-2,493 MHz).
ET Docket 00-258 DoD Uplinks at 2 GHz	May 21, 2006, White Paper on DoD uplinks.
RM-11308 ULS entries for ENG-RO and RPU-RO sites	May 21, 2006, RM-11308 White Paper
ET Docket 05-345 Wireless Mics for NPP operators	May 18, 2006, MSTV/NAB/SBE draft agreement with NEI/UTC regarding use of Texlex headsets on UHF TV channels by nuclear power plant (NPP) operators.
ET Docket 04-186 Part 15 Devices on "Unused" TV Channels	May 12, 2006, SBE letter to MSTV regarding TV "white spaces."
ET Docket 00-258 DoD Uplinks at 2 GHz	May 2, 2006, SBE Petition for Reconsideration of the April 11, 2006 Fourth MO&O
RM-11308 ULS entries for ENG-RO and RPU-RO sites	April 18, 2006, SBE <i>ex parte</i> rebuttal to late-filed CTIA RM-11308 opposition filing.
WD2XPK Trucker TV	March 14, 2006, SBE letter to OET, disputing portions of the Clarity WD2XPK six-month experimental report regarding "Trucker TV" experimental stations at Frazier Park, CA; North Salt Lake City, UT; and Ogden, UT.
RM-11308 ULS entries for ENG-RO and RPU-RO sites	March 2, 2006, SBE <i>ex parte</i> rebuttal filing to the Sprint Nextel filing opposing RM-11308.
RM-11308 ULS entries for ENG-RO and RPU-RO sites	February 17, 2006, SBE comments re-affirming its support of an NPRM that would allow TV Pickup licenses to enter the locations and heights of their ENG-RO sites in the ULS.
ET Docket 05-345	January 30, 2006, SBE Reply Comments.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

<u>Item</u>	<u>Status</u>
Wireless Mics for NPP Operators	
EB Docket 04-296	January 24, 2006, SBE comments to the EAS FNPRM.
ET Docket 05-345 Wireless Mics for NPP (NPP) Operators	January 17, 2006, SBE Comments opposing an eligibility waiver to allow nuclear power plant operators to obtain Part 74, Subpart H Low Power Auxiliary wireless mic licenses.
WD2XPK Trucker TV	November 22, 2005, SBE Informal Objection to the Clarity CARS applications for new 2 GHz Trucker TV base stations at Frazier Park, CA: North Salt Lake City, UT; and Ogden, UT.
IB Docket 05-221 Returned MSS Spectrum	November 17, 2005, joint SBE/MSTV/NAB <i>ex parte</i> letter regarding 24 MHz of returned MSS spectrum at 2 GHz.
RM-_____ 950 MHz Aural BAS	September 19, 2005, SBE Petition for Rulemaking to create minimum antenna performance standards for 950 MHz Aural BAS stations.
RM-_____ ENG-RO/RPU-RO sites	September 6, 2005, SBE Petition for Rulemaking to modify the ULS to allow TV Pickup stations and RPU stations to enter the locations and heights of their ENG-RO and RPU-RO sites in the ULS.
IB Docket 05-221 Returned 2 GHz MSS spectrum	July 29, 2005, SBE comments regarding return of un-used MSS spectrum; proposed that 12 MHz of the surrendered 13.3 MHz of MSS spectrum, at 2,000–2,006 MHz and at 2,180–2,186 MHz, be re-allocated to Part 74, Subpart H, Low Power Auxiliary stations ( <i>e.g.</i> , wireless microphones).
IB Docket 02-364 MSS Systems at 1.6/2.4 GHz	July 11, 2005, SBE response to Globalstar reply to SBE Informal Objection to deploy MSS ATC base stations at 2,487.5–2,493 MHz (co-channel with TV BAS Channel A10)
WT Docket 02-55 2 Ghz SMR (Nextel)	June 29, 2005, SBE <i>ex parte</i> comments in support of Nextel Request for Declaratory Ruling regarding expanded eligibility for reimbursement dates for 2 GHz TV BAS licensees.
Clarity "Trucker TV" Experimental License WD2XPK	May 18, 2005, SBE Informal Objection to the Clarity experimental application to test the feasibility of using the entire 2 GHz TV BAS



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

Item	Status
	band for subscription basis entertainment media at truck stops throughout the U.S.
IB Docket 02-364 Systems at 1.6/2.4 GHz	May 16, 2005 SBE Informal Objection to MSS Globalstar application to deploy Ancillary Terrestrial Component (ATC) base stations at 2,487.5–2,493 MHz in the ten largest U.S. cities (co-channel with grandfathered TV BAS Channel A10).
Request for Declaratory Ruling Number of Transmitters Authorized by a TV Pickup License	March 10, 2005, Request for Declaratory Ruling on the number of transmitters that a TV Pickup station license authorizes to be used.
WT Docket 05-23 Automatic Termination of ULS Licenses	February 21, 2005, SBE Request for Clarification regarding automatic of ULS Licenses for which no "constructed" notification is filed.
WT Docket 04-356 Service Rules for 2 GHz AWS Stations	February 8, 2005, SBE reply comments regarding service rules for 2 GHz AWS stations. Proposed 0.5 km "keep away" distance from ENG-RO sites and tighter emission mask for AWS base stations.
ET Docket 04-186 Part 15 Devices on Unused TV Channels	January 31, 2005, SBE reply comments opposing Part 15 devices on "unused" TV channels (so called "white spaces").
WT Docket 04-356 Service Rules for 2 GHz AWS Stations	December 8, 2004, SBE comments requesting stricter OOB limits for 2,020–2,025 MHz AWS stations, and a 0.5 km "keep away" distance to ENG-RO sites.
ET Docket 04-186 Part 15 Devices on Unused	November 30, 2004, SBE comments opposing Part 15 devices on "unused" TV channels.
IB Docket 02-364 MSS Systems at 1.6/2.4 GHz	November 29, 2004, SBE <i>ex parte</i> filing in support of the October 27, 2004, Nextel filing in turn supporting the September 8, 2004, SBE Petition for Reconsideration of the IB Docket 02-364 R&O (impacting 2.5 GHz TV BAS channels A8, A9 and A10).
EB Docket 04-296 Improvements to EAS	November 29, 2004, SBE reply comments.
EB Docket 04-296 Improvements to EAS	October 29, 2004, SBE comments regarding improvements to EAS.
ET Docket 00-258	November 24, 2004, SBE Petition for



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as of October 10, 2007**

Item	Status
DoD Uplinks at 2 GHz	Reconsideration of the ET 00-258 Seventh R&O,
EB Docket 04-296 Improvements to EAS	November 29, 2004, SBE reply comments.
EB Docket 04-296 Improvements to EAS	October 29, 2004, SBE comments regarding improvements to EAS.
IB Docket 02-364 MSS Systems at 1.6/2.4 GHz	September 8, 2004, SBE Petition for Reconsideration of the IB Docket 02-364 R&O, pointing out conflict with grandfathered TV BAS Channel A10.
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 devices for the 13 GHz TV BAS band.
RM-10836, EVSS Emergency Vehicle Signaling Systems	March 31, 2004, SBE reply comments pointing out that ADi Corp 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 10, 2007**

Item	Status
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 Docket 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 uplinks, vs. terrestrial 7 & 13 GHz TV BAS links, CARS links and POF links.	SBE Reply comments filed March 18, 2004. Opposed "full spectrum, full arc" frequency coordination for uplinks as "spectrum Gateway 13 warehousing," and requested confirmation that between co-equal stations the newcomer station must protect the earlier in time station.
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, and POFS links.	SBE comments filed March 3, 2004. SBE opposes giving MSS uplinks/downlinks "full arc, full spectrum" protection. SBE believes that 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.
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



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

Item	Status
	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.
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.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

<u>Item</u>	<u>Status</u>
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 <i>ex parte</i> 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 <i>ex parte</i> 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.
ET Docket 98-142 7 GHz MSS Feeder Downlinks  BAS	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 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 <i>ex parte</i> filings regarding EAS decoders for small cable systems and LPFM stations.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

<u>Item</u>	<u>Status</u>
IB Docket 01-185 Terrestrial MSS	November 13, 2001, SBE reply comments.
ET Docket 00-258 Third Generation ("3G") Wireless Services	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.
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 band.
"SBE frequency coordination" clause to be placed on OET experimental licenses and STAs	February 12, 2001, email to Mr. Carl Huie of OET regarding suggested wording for "SBE" coordination clause to be placed on OET experimental licenses and experimental STAs authorizing operations on broadcast or BAS frequencies; establishment of toll-free SBE telephone number in support of this license/STA condition.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

Item	Status
Letter to OET regarding "prior coordination" clause for OET experimental STAs and licenses authorizing operation on BC or BAS frequencies.	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, <i>et al</i> , for Part 74 low power auxiliary wireless communication systems	January 21, 2001, letter report to SBE President Andy Butler.
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 experimental licenses or STAs that authorize use of BC or BAS frequencies.	October 12, 2000, letter to Mr. James Burle, 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) R&O/MO&O to ET Docket 95-18	September 5, 2000, SBE Petition for Partial Reconsideration of the July 3, 2000, Second 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. Proposed 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]).



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as of October 10, 2007**

<u>Item</u>	<u>Status</u>
Wireless Video Assist Devices on Un-Used VHF and UHF Television Channels (RM-9856)	SBE opposition comments filed on May 23, 2000. There are <i>no</i> "un-used" TV any more, plus this service would be ripe for "rogue operation" by devices not meeting Part 15 limits.
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 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 on 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 NCFM 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 in-appropriate and would constitute <i>de facto</i> reallocation of the 2.5 GHz band to public safety.
(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



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

<u>Item</u>	<u>Status</u>
	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 proposed that PCOs only be allowed access to the 13 GHz CARS on a secondary basis. SBE opposed 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)  Docket	SBE Comments filed June 24, 1999. SBE opposed the rule making as grossly premature and pre-judging the outcome of ET 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 the FCC to policy to immediately allow digital modulation.
NGSO FSS Systems Operating 13 GHz TV BAS Band (“Gateway” uplinks) ET Docket 98-206	SBE Comments filed March 2, 1999. The comments pointed out that the 13 GHz TV BAS band is heavily used and supports 100-km preclusion zones around the top-50 population centers.
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 Petition.	March 6, 1998, SBE filing in support of TIA



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as of October 10, 2007**

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allow digital modulation in the 2, 2.5, 6.5, 7 and 13 GHz TV BAS bands	to allow digital modulation. SBE urged the FCC to assign a rulemaking and to proceed forthwith to a rulemaking.
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 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 the FCC (accepted by the	Comments filed February 13, 1998, in regard to December 22, 1997, letter from NWS to FCC as a Petition for Rulemaking).
Request for Declaratory Ruling MM Docket 94-130	SBE Request for Declaratory Ruling regarding certain aspects of the 1995 (Unattended Operation) R&O on unattended operation of broadcast stations. Petition filed on April 7, 1998.
Mandatory PCN for BAS RM-_____ Coordination	SBE Petition for Rulemaking drafted January 19, 1998, and circulated to SBE Frequency 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	SBE comments concerning February 1997 SkyBridge application, and the July 3, 1997,



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

<u>Item</u>	<u>Status</u>
	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-915	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 FNPRM, concerning implementation dates, and	June 20, 1997, SBE comments to the Docket 95-18 MSS, reallocation of 2 GHz BAS frequencies, reimbursement obligations.
ET Docket 95-18, MSS Petition	June 19, 1997, SBE filing opposing the MSS 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 and businesses. RM-8837.	Petition filed will FCC on June 10, 1996. Indirectly threatens the 2 GHz and 2.5 GHz TV BAS bands (1,990–2,110 MHz and 2,450–2,483.5 MHz) because it would preclude 2 GHz spectrum available on a case-by-case "spill over" basis. SBE opposition comments filed on December 23, 1996. Petition DISMISSED on August 5, 1997.
Public Safety Spectrum Requirements Through the Year 2010. WT Docket 96-06.	Proposes huge raids on broadcast and BAS frequencies, for re-allocation to public safety. The Public Safety Wireless Advisory Committee (“PSWAC”) report found by SBE to contain several gross errors. SBE Reply Comments pointing out these errors filed on December 19, 1996.
Petition for Rule Making by NASA to codify existing	Formal SBE letter in support of NASA petition to IRAC sent July 3, 1996. Matter was considered



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

<u>Item</u>	<u>Status</u>
informal sharing of 2 GHz TV BAS frequencies.	at the October 8, 1996, IRAC meeting (IRAC Docket No. 30063). IRAC referred item to FCC on January 2, 1997, with positive recommendation.
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, 1996. R&O 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 to allow unlicensed, Part 15 devices access to the TV bands. Comments filed on May 16, 1996. R&O issued on October 20, 1997. SBE warnings <i>not</i> heeded.
Radio Astronomy Coordination Zone for Arecibo Radio Astronomy Observatory in Puerto Rico. ET Docket 96-02.	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 BAS 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 BAS 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.
Possible Petition for Rule Making Frequency Coordination Exhibit Mandatory	Free to proceed as a result of copying coordination 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 Mr. Charles Sears to John Poray.
WRC 95 IC Docket 94-31 ("MSS") Mobile Satellite Services	Joint Comments of MSTV, NAB, ABC, CBS, NBC PBS, RTNDA, and SBE, objecting to speeded-up implementation date for 2 GHz MSS from January 1, 2005, to January 1, 1996. Late filing by MSS Joint Parties proposing 450-451 and 455-456 MHz



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

Item	Status
	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 broadcasters 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.
Unattended Operation MM Docket 94-130	SBE Comments filed January 30, 1995, support 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 government returned spectrum will be auctioned; none for TV BAS.
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	Participation in <i>Joint Request for</i>



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

Item	Status
Gen. Docket 90-314	<i>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.
FCC Adoption of the 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 <i>five times</i> 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.
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 MHz. ET Docket 93-59	SBE initial comments filed June 15, 1993. SBE reply comments filed July 15, 1993.
DARS use of 7 GHz TV BAS 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	SBE comments filed February 18, 1993.



**Summary of SBE FCC Liaison Committee Activities and Filings  
as of October 10, 2007**

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Zone; RM-8165	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.
DARS use of 7 GHz TV BAS 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: Use of New Telecommunication Technologies	SBE comments filed June 1, 1992. Spectrum to Encourage Innovation. 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 Broadcast System	SBE comments filed March 30, 1992. Follow-up Further NOI and NPRM the Emergency 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 PR Docket 90-5	SBE comments filed October 8, 1991; Favorable MO&O released Dec. 4, 1991; confirmed 23 GHz POFS links still available to broadcasters.
Personal Communications Services Docket 90-314	Informal comments filed on April 11, (PCS) Gen. 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	Petition filed in November 1990; FCC action still PENDING. However, survey of frequency coordinating 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 10, 2007**

Item	Status
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. No FCC action.
"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	SBE comments filed December 12, 1988. R&O released March 4, 1992.
NRSC-1 & NRSC-2 Standards MM Docket 88-376	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

