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BY E-MAIL JAMES.BURTLE@FCC.GOV

March 23, 2007

Mr. James R. Burtle
 Chief, Experimental Licensing Branch
 Office of Engineering and Technology
 Federal Communications Commission
 445 12th Street, SW
 Washington, DC 20554

Dear Mr. Burtle:

SBE would like to lodge its informal objection to the application by Ericsson Inc ("Ericsson") for an experimental Special Temporary Authority (STA) for Parsippany, NJ, at 2,110-2,120 MHz (the Advanced Wireless Services (AWS) A-block). The file number of this application is 0139-EX-ST-2007. The application was filed on March 16, 2007.

The reason for SBE's opposition is Ericsson's behavior in Queens, NY, where it holds experimental STA WC9XSK, also for 2,110-2,120 MHz.¹ That STA had a condition requiring Ericsson to conduct prior coordination with TV Pickup licensees before commencing operation. Ericsson failed to do so, and its operations at 2,110-2,120 MHz caused Station WABC-TV in New York City several weeks of serious interference to its Northshore electronic news gathering (ENG) receive only (RO) site in Queens. It took WABC-TV approximately three weeks to track down the interference caused by the Ericsson WC9XSK experimental operation. Although SBE understands that Ericsson shut down the experimental operation upon being advised of the interference, at least during the heavy ENG use afternoon hours, had Ericsson complied with the prior coordination condition on the STA WABC-TV would have been alerted to that station's existence, and could have immediately contacted Ericsson, instead of having to first suffer several weeks of interference. (Ericsson has now amended its WC9XSK experimental STA to just the top half of the 2,110-2,120 MHz AWS A-block; while this may mitigate the interference to the Northshore ENG-RO site if the problem is due to out-of-band-emissions (OOBE), it will likely have little mitigation impact if the interference is due to brute force overload (BFO). Finally, it should be noted that the WABC-TV "home channel" is TV BAS Channel A7, currently 2,093-2,110 MHz, which makes that station's ENG

¹ The STA also authorizes operations on 1,710–1,720 MHz, but this 1.7 GHz operation (for handsets) is not an interference threat to 1,990–2,110 MHz TV Broadcast Auxiliary Services (BAS) operations.

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operations most at risk of OOB interference from adjacent-band AWS base stations.)

SBE would withdraw its Informal Objection if Ericsson amends its Parsippany application to include a statement that, before commencing operations, it will contact all TV Pickup licensees in the area, plus the NYC area Above-1 GHz frequency coordinator, and first ascertain the locations of all ENG-RO sites within 5 km of the proposed area of operation. Further, Ericsson needs to state that it will provide each contacted TV Pickup licensee, and the NYC Above-1 GHz frequency coordinator, with a "hot line" telephone number that will be staffed whenever the Parsippany experimental operations are underway, with the understanding that in the event of harmful interference to an ENG-RO site the experimental operations will be immediately terminated, and not re-commenced until a mutually agreeable time and date has been set up with the interfered-with TV Pickup licensee, to see what mitigation measures might be possible to avoid any additional interference.

SBE would also urge OET to again place the "TV Pickup station" prior coordination notice condition on the Parsippany experimental STA, assuming that Ericsson amends its application as requested by SBE, and that application then gets granted.

Sincerely,



Chriss Scherer

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