

SBE Comments: DA 06-1664, Trucker TV
NASA Letter to NTIA Regarding Trucker TV

National Aeronautics and
Space Administration
Headquarters
Washington, DC 20546-0001



April 8, 2005

Reply to the Attn of: Space Comm Office

Mr. Karl Nebbia
Chairman, IRAC
National Telecommunications and
Information Administration
Department of Commerce
14th and Constitution Avenue, N.W., Room 1087
Washington, DC 20230

Re: Clarity Broadcasting Systems, LLC
FCC Form 442
Exhibit No. 1
March 2005

Dear Mr. Nebbia,

On March 2, 2005 Clarity Broadcasting Systems filed an application¹ for an experimental license to test a new "ultra-low power, short-range multi-channel video distribution system." It would use 14 6-MHz wide channels covering the entire 2 GHz Federal Government Space Research Service band at 2025-2110 MHz. This band is shared equally between government space operations and the Broadcasters who use the band for Electronic News Gathering (ENG).

Clarity's describes the system as an "ultra-low power," system using a horizontally polarized omni-directional antenna with an effective isotropic radiated power (EIRP) of 10 watts per 6-MHz channel to deliver TV programming to stationary vehicles such as trucks and recreational vehicles located within 0.7 km of one of its transmitters. Clarity intends to secure permanent authority from the Commission to offer this service at more than 250 individual locations spread across the country. Clarity is applying to the Commission for permanent authority to operate this multi-channel video distribution system at these locations, and it said it expects to begin rolling out the offering as soon as Commission authority is received.

¹See Enclosure 1



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The purpose of this letter is to bring this issue to the attention of the IRAC as well as to encourage the NTIA to solicit initial coordination with the FCC on this matter. There are potentially very serious RFI issues which will need to be addressed prior to the consideration of the issuance of any experimental license.

NASA requests that this experimental license not be granted until a full and complete systems analysis is conducted on potential RFI. However, irrespective of the outcome of these RFI assessments, any license granted would have to be made under operational provisions specified by the NTIA to ensure electromagnetic compatibility with Federal spectrum operations. It is NASA's assumption that the FCC has or will bring this issue to the IRAC table, but to be vigilant and on the cautious side, we request that the FCC be notified immediately of our concern.

If you have any questions concerning this matter please contact Mr. James E. Hollansworth at (216) 433-3458 or e-mail jhollansworth@grc.nasa.gov.

Sincerely,



David P. Struba
NASA IRAC Representative
Office of Space Flight

Enclosures

