



SOCIETY OF BROADCAST ENGINEERS, INC.

The Association for Broadcast and Multimedia Technology Professionals

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MEMORANDUM

To: All Broadcast Auxiliary Service Frequency Coordinators
From: Ted Hand, Chairman, SBE Frequency Coordination Committee
Chris Imlay, SBE General Counsel
Re: National Frequency Coordination Database for 2 GHz.
Date: March 23, 2016

Greetings. This memo is distributed to all BAS market coordinators associated with SBE. This is a good opportunity for SBE to thank you all for the largely invisible but tremendously (and increasingly) important job that you do for the Broadcast Industry. SBE is proud of your work in database management and in real-time coordination work on a daily basis. SBE's Board of Directors is very sensitive to the substantial commitment of time that you each have made for the betterment of the industry and for broadcast engineering. Thank you so much. You all do great work. It is SBE's job to make sure that we don't ask too much of you and we are looking for ways to make your coordination work easier. That is what this memo is about.

You are all well-aware that NTIA and FCC have saddled broadcasters with using best efforts to accommodate sharing of the BAS 2025-2110 MHz band with certain operations of the Department of Defense (DoD) that were displaced from the AWS-3 band at 1755-1780 MHz. That AWS-3 band has been auctioned and the DoD operations that were in there are going to either the 1755-1850 MHz or to the 2025-2110 MHz band. SBE and NAB worked very hard together in FCC Docket 13-185 to make sure that BAS at 2 GHz was not disrupted. We think we were successful in doing that. While DoD did get a co-primary allocation in our 2 GHz band, and while we are obligated to do our best to accommodate displaced DoD operations from the AWS-3 band, two footnotes to the Table of Allocations that SBE and NAB were able to negotiate protect BAS operations from interference. First, Federal operations are limited to the military only. Second, new military operations are required to be coordinated, via a memorandum of understanding between the DoD and the BAS community, represented by NAB and SBE. We are negotiating that memorandum of understanding now and have been for the past year and a half. Most importantly, a new footnote to the domestic table of allocations specifies clearly that DoD cannot "constrain" BAS, CARS or LTTS use of the 2 GHz band:

Federal use shall not cause harmful interference to, nor constrain the deployment and use of the band by, the Television Broadcast Auxiliary Service, the Cable Television Relay Service, or the Local Television Transmission Service. To facilitate compatible operations, coordination is required in accordance with a Memorandum of Understanding between Federal and non-Federal fixed and mobile operations. Non-Federal licensees shall make all

reasonable efforts to accommodate military mobile and fixed operations; however, the use of the band 2025-2110 MHz by the non-Federal fixed and mobile services has priority over military fixed and mobile operations.

The “reasonable efforts” that we must make to try to accommodate DoD displaced operations involve our coordination of DoD operations along with BAS. DoD is working out a plan to automate this as much as possible, and to minimize the points of contact that you as coordinators will have to worry about. DoD has seven regional coordinators of their own, and the one that covers your market will be the one point of contact for you. We will try hard to avoid increasing your workload at all. We think we can do this.

DoD has offered to prepare for us, and to maintain, a national database of BAS, CARS and LTTS operations. This would be kept up to date by DoD and made available to each of you. It will be prepared by using your database information and, for fixed facilities in the 2025-2110 MHz band, FCC’s ULS database. DoD is well-aware that you have far better understanding of what is going on in your markets and that the ULS is flawed. So they are very much dependent on your database information for the 2 GHz band *only*. What you provide will supersede conflicting information in the ULS unless you tell us otherwise.

SBE is of the view that this is a good opportunity to obtain at no cost a useful tool for each of you that will: (1) minimize your database management time and effort; (2) have at your fingertips adjacent market information that can be helpful to you in coordinating BAS, CARS and LTTS facilities going forward; (3) ensuring that there is a common understanding of which DoD facilities are where and which BAS facilities are where, in the event of interference; and, perhaps most importantly, (4) help us determine what DoD uses really cannot be accommodated at 2 GHz due to BAS occupancy at 2 GHz now and for the foreseeable future. We are therefore requesting that you provide your 2 GHz database information -- in whatever form and format it is now -- to SBE Headquarters to assemble and deliver to DoD. We will assure you that this database will not become public. It will be shared only with our DoD partners, who will not release it publicly either. Each of you will be given the national database prepared from that information and periodically it will be updated, most frequently of course at the early stages of the DoD reaccommodation effort. Nothing would preclude you from maintaining your own database separately if you choose to do so in whatever format you find useful.

To assure the database that the DoD is using is as accurate as possible, it needs the most current, accurate information with the greatest amount of detail that you have available. The long term outcome is a periodically updated, continuously accurate picture of how the band is being used in each market, nationwide.

Only 2025-2110 MHz data is needed; 2450-2500 MHz information is *not* needed. Data on any other Part 74 bands are not needed. If it is a mobile newsgathering link, only the receive site

location is needed. If it is a fixed link, we will need both ends of the links. Transmit and receive. Long/Lat coordinates of the site of course is the best form of data. If you have the ARS number, that can be used and we will accept a street address if nothing else is available. Receive antenna height and whether it's a steerable or panel/horn antenna is also important to know if you have it. If the local market has a band use plan, that would be helpful also. Data can be formatted as an Excel spreadsheet, Word document or basically any means that the data is kept by you. Whatever information you have is welcome, even if it is on paper.

Please send your database to SBE Executive Director, John Poray via email at jporay@sbe.org or to John's attention by fax, at 317 846-9000. Please send you database as soon as you are able but no later than Wednesday, April 13.

Thank you for your help with this. Working together we can best protect BAS operations from interference and at the same time minimize, and perhaps even decrease, your workload. Let us know any concerns that you have and also any ideas for the database that will make it more useful to you. We will be discussing this in detail at the Frequency Coordinator's meeting that SBE is holding during the NAB Show from 8:30 to 10:30 am PT on April 19 in Conference Rooms 7-8 of the Westgate Hotel. DoD representatives will be there to answer your questions and to fill you in on their plans, needs and ideas. These are cooperative people and they are and have been in good faith all along.

Thanks again for your help and your good work.