

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Converting the CDBS to NAD83 ) RM No. \_\_\_\_\_  
 )

To: The Commission

**Petition for Rulemaking**

The Society of Broadcast Engineers, Incorporated (SBE), the national association of broadcast engineers and technical communications professionals, with more than 5,000 members world wide, hereby respectfully submits its Petition for Rule Making to convert the Media Bureau's Consolidated Data Base System (CDBS) to North American Datum 1983 (NAD83) geographic coordinates.

**I. The CDBS Is Past-Due For Converting to NAD83**

1. On March 14, 1988, the Commission released its first public notice regarding the use of NAD83 coordinates, "FCC Interim Procedures for the Specification of Geographic Coordinates," DA 88-316. In that 1988 notice the Commission stated that it would eventually convert to use of NAD83 to maintain accuracy in its records and to maintain consistency with other government agencies and foreign administrations. However, the 1988 Notice instructed that, for the time being, North American Datum 1927 (NAD27) were to continue to be used.

2. In a follow-up September 1, 1992, public notice, "The Federal Communications Commission Continues to Require Applicants to Use Coordinates Based on the North American Datum of 1927," the Commission indicated that NAD27 coordinates would be used during an interim period, while noting that "The FCC will eventually be required to use NAD83 in all of its activities, including licensing and the maintenance of databases."

3. At Paragraph 124 of the October 21, 1998, WT Docket 96-188 Report & Order (R&O), the Commission noted that the Federal Aviation Administration (FAA) had converted to NAD83 coordinates as of October 15, 1992. At Paragraph 125 of the R&O, the Commission stated that it would require NAD83 coordinates in all filings with the Wireless Telecommunications Bureau (WTB) six months after the effective date of the R&O. Since the

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R&O was published in the Federal Register on December 14, 1998, this meant that the R&O became effective on January 13, 1999, and thus that WTB has required use of NAD83 coordinates since July 13, 1999.

4. In light of the fifteen years that have passed since the FAA converted to NAD83, and in light of the eight years that have passed since WTB converted to NAD83, SBE submits that the Media Bureau (MB) is past-due to convert the CDBS to NAD83. SBE further notes that the International Bureau uses only NAD83 coordinates, as does the Office of Engineering & Technology. The continued use of NAD27 coordinates by the Media Bureau causes nothing but confusion (*i.e.*, "Are the provided coordinates NAD27 or NAD83?") to persons filing with both the Media Bureau and the Wireless Telecommunication Bureau (*e.g.*, with the Media Bureau for broadcast stations, but with the Wireless Telecommunications Bureau for Broadcast Auxiliary Service (BAS) stations and antenna structure registrations). To circumvent this confusion, the Media Bureau should embrace NAD83 and convert all existing NAD27 coordinates in the Media Bureau's CDBS.

5. SBE sees no need for the Media Bureau to re-issue all broadcast station licenses with converted NAD83 coordinates; it would be sufficient to simply reflect NAD83 coordinates on all newly-issued authorizations, with the datum clearly indicated.

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### **II. Summary**

6. The Media Bureau should immediately convert the CDBS to NAD83. There is no justification for the continued use of NAD27 coordinates fifteen years after FAA converted to NAD83, and eight years after the Wireless Telecommunications Bureau converted to NAD83. Such conversion will simplify Media Bureau filings and reduce coordinate conversion errors that must now be made in connection with Media Bureau filings.

Respectfully submitted,

Society of Broadcast Engineers, Inc.

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SBE President

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