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BY FACSIMILE: 202/418-1918

October 13, 2000

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

Dear Jim:

This letter is a follow-up to my October 12 telephone call, concerning the policy of placing a contact-the-local-BAS-coordinator clause on any experimental licenses issued for operation on broadcast or broadcast auxiliary services (BAS) frequencies. As I explained, this policy was established in a December 24, 1996, letter to your predecessor, Mr. Paul Marrangoni; a copy of that letter is attached.

In accordance with that policy, SBE started to see experimental licenses with a BAS frequency coordination clause; for example, an experimental license issued to Telex Communications, Inc., WA2XVM, for 518–608 MHz (TV Channels 22–36) and 614–764 MHz (TV Channels 38–62) had, as special condition 4, “Subject to prior coordination with Society of Broadcast Engineers, Inc. area frequency coordinator.” SBE was gratified to see a prior coordination requirement, as it ensures that if an experimental station operating on broadcast or BAS frequencies does cause interference, the local frequency coordinator will have a good place to start in responding to any telephone calls from local broadcasters about mysterious new interference.

However, I recently received an email from Mr. Howard Fine of the Southern California Frequency Coordinating Committee (SCFCC) indicating that a special temporary authorization (STA), FCC File No. 0469-EX-ST-2000 XE FX, was issued to U.S. Sea Launch at Long Beach, California, for 2,339.136–2,339.264 MHz, 2,339.636–2,339.764 MHz, 7,048.685–7,049.315 MHz, and 7,073.685–7,074.315 MHz. The two 7 GHz frequencies fall in TV BAS Channels B7 (7,025–7,050 MHz) and B8 (7,050–7,075 MHz), yet the STA did not include a TV BAS prior coordination in its list of special conditions.

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As you are probably aware, all of the ten 7 GHz TV BAS band channels are heavily used and exquisitely frequency coordinated in the Southern California area by SCFCC, which is probably the largest and most active of all of the TV BAS frequency coordinating committees. If U.S. Sea Launch were to fire up on either of the 7 GHz channels while in port, for confidence test purposes, but without prior coordination, interference to broadcaster's TV Pickups operating on Channels B7 and B8 could result. If the local coordinator has not been informed, he will not know who or where to call to request termination of the offending transmission.

The purpose, then, of this letter is to confirm that the prior coordination "special condition" policy is still in effect for experimental licenses authorizing operation on broadcast or BAS frequencies, and to request that this policy be extended to apply to any form of authorization issued by OET; that is, to specifically include STAs.

In support of this request, I wish to inform you that SBE has completed its updating of frequency coordinator by state and county maps for all fifty states plus the District of Columbia and Puerto Rico, showing which counties are covered by a TV BAS frequency coordinator. There is also a related spreadsheet giving each coordinator's name, address, telephone and facsimile numbers, and email address. These colorized and updated maps, and the spreadsheet, are now posted on the SBE web page (www.sbe.org/freq/index.html). The maps and the spreadsheet are posted as Adobe Acrobat portable document format (pdf) files, so as to ensure they will work with both PCs and Macs. Both the maps and the spreadsheet are updated as necessary to reflect changes.

SBE would, therefore, request that the special condition frequency coordination requirement be updated to include a referral to the SBE web site. SBE trusts that OET will agree that the maps and frequency coordinator spreadsheet now on the SBE web site will make it easy for experimental licensees or STA holders to determine if their experimental operation is in a county covered by a BAS frequency coordinator and, if so, how to contact that coordinator.

Thank you for your consideration. Should you have any questions regarding this request, please feel free to contact me, at 707/996-5200, or Mr. Rick Edwards, who is the SBE Vice President and chairs the SBE Frequency Coordination Committee, at 954/757-5757.

Sincerely,

Dane E. Ericksen
Chairman, SBE FCC Liaison Committee
SBE Board of Directors

Enclosure

cc: Mr. Howard Fine, SCFCC
All SBE officers and directors
All SBE FCC Liaison Committee members

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Mr. Paul Lentz, SBE Frequency Coordinator List Administrator
Mr. John Poray, SBE Executive Director
Christopher D. Imlay, Esq., SBE General Counsel