

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Promoting Spectrum Access for Wireless Microphone Operations)	GN Docket No. 14-166
)	
Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions)	GN Docket No. 12-268
)	

**REPLY COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS**

The National Association of Broadcasters (NAB)¹ submits these reply comments in response to the Commission’s Notice of Proposed Rulemaking in the above proceedings.² Initial comments by a variety of parties overwhelmingly demonstrate the importance of wireless microphones for activities ranging from electronic news gathering (ENG) to content creation to live performances.³ At the same time, the Commission’s proposals for the incentive auction will almost entirely displace wireless microphones from the UHF band. The record in this proceeding demonstrates the need for the

¹ The National Association of Broadcasters is a nonprofit trade association that advocates on behalf of free local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² *Promoting Spectrum Access for Wireless Microphone Operations, Expanding the Economic Opportunities of Spectrum Through Incentive Auctions*, Notice of Proposed Rulemaking, GN Docket No. 14-166, GN Docket No. 12-268, FCC 14-145 (rel. Sept. 30, 2014) (“Wireless Microphone NPRM”).

³ See, e.g., Comments of Sennheiser Electronic Corporation at 1-3; Comments of Shure Incorporated at 2, 5-6; Comments of the Performing Arts Wireless Microphone Working Group; Comments of Broadcast Sports, Incorporated.

Commission to reexamine its proposals and make appropriate accommodations for wireless microphones.

As the Commission is well aware, licensed wireless microphones play a vital role in covering breaking news. Newsgatherers have relied on UHF spectrum for wireless microphone operations for years. In 2010, they committed to doing more with less spectrum, giving up exclusive access to between 10 and 20 channels in most major markets to operate on just two reserved channels.

Now, once again, newsgatherers are being asked to use still less spectrum as they deliver emergency information and other critical news to the public. As a “compromise” solution, the Commission proposed to allocate a scant 4 MHz of space in the duplex gap for these operations. But even this promise has proven hollow. Because the Commission is considering placing repacked television stations in the duplex gap, in reality, there will be *no* reliable spectrum for ENG operations to use wireless microphones.

This failure to provide any reliable spectrum for ENG and other important wireless microphone operations must be corrected. NAB continues to urge the Commission to allocate the entire duplex gap exclusively for wireless microphone operations, to provide at least some small sliver of reliable spectrum that will always be available.

The Commission also owes it to the now displaced wireless microphone community to conclude this proceeding as quickly as possible, immediately identify new bands on which wireless microphones may operate and authorize new bands for wireless microphone operations before the commencement of the incentive auction to ensure that wireless microphone users are able to transition their operations. We urge the Commission to set a firm timetable for allocating additional bands. The Commission should further allow wireless microphones to continue to operate in the 600 MHz band

until winning forward auction bidders are actually ready to deploy in the area *and* the Commission has identified alternative bands to which wireless microphone operations can relocate.

Respectfully submitted,

**NATIONAL ASSOCIATION OF
BROADCASTERS**

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A handwritten signature in black ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right.

Rick Kaplan
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February 25, 2015