

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

In the Matter of: )  
)  
Petition for Rulemaking in the Matter of Subpart ) RM-11915  
L of Part 90 of FCC Rules: Updated Method To )  
Determine Potential Interference Between Land )  
Mobile Stations and Digital Television Stations )  
Operating in the 470-512 MHz Band (“T-Band”) )

**COMMENTS OF  
THE NATIONAL ASSOCIATION OF BROADCASTERS**

The National Association of Broadcasters (NAB)<sup>1</sup> hereby submits comments in response to the Petition for Rulemaking (Petition) submitted by the Land Mobile Communications Council (LMCC).<sup>2</sup> In its Petition, LMCC asks the Commission to modify its rules for land mobile sharing of television channels 14-20 (the “T-band”).<sup>3</sup> NAB urges the Commission to exercise caution in considering any changes to the existing rules.

The changes LMCC proposes could have the practical effect of increasing instances of harmful interference between television stations and land mobile operations in the T-band by allowing television stations and land mobile operations to operate in closer proximity to one another. However, as the Commission is well aware, there are occasional complaints

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<sup>1</sup> The National Association of Broadcasters (NAB) is the 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.

<sup>2</sup> Petition for Rulemaking of the Land Mobile Communications Council, RM-11915 (June 24, 2021).

<sup>3</sup> *Id.* at Attachment 1.

concerning interference issues between television stations and T-band land mobile operators under the existing rules, including from LMCC itself.<sup>4</sup>

Allowing television stations and T-band land mobile users to operate closer to one another could make these interference issues more commonplace, which hardly seems consistent with the public interest. Indeed, given that land mobile operations in the T-band could well be the victims of interference more often than television stations, it is unclear why LMCC believes it to be in its interest to seek the changes it proposes.

Accordingly, NAB strongly urges the Commission to exercise caution in considering any changes to the existing rules governing T-band operations, and to adopt any changes only following the development of a fulsome technical record that confirms such changes will not materially increase the likelihood of harmful interference.

Respectfully submitted,

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February 10, 2022

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<sup>4</sup> See Letter from Klaus Bender to Michelle M. Carey, Lisa Fowlkes, Rosemary Harold, Donald Stockdale, and Ron Repasi (Aug. 28, 2020).