

Explanation of Request for STA

This regards a request by Broad Comm, Inc. (Broad Comm) for Special Temporary Authority (STA) to allow use of various frequencies as detailed below. The purpose is to provide support to the broadcast television networks for coverage of the Republican National Convention that is currently scheduled to take place at the Spectrum Center, 333 E. Trade St., Charlotte, NC between August 24 and August 27, 2020. In order to allow for setup and testing, flexibility in dates due to the current pandemic and some use immediately following the convention the STA request covers the period from August 1 through August 30, 2020.

Broad Comm provides radio-frequency support services to broadcasters and broadcast network entities for coverage of major events. The FCC has granted Broad Comm and others similar requests for several previous events.

The following frequencies assigned for television broadcasting are being requested for use with wireless microphones. The requested frequencies are not expected to cause interference to local television due to the low power being requested (2 watts maximum – but typically < 250 mW) and the shielding provided by indoor use within the venue.

Channels	REQUESTED FREQUENCY RANGE (MHz)	
	LOWER FREQUENCY	UPPER FREQUENCY
7 - 10	174.5	197.5
13	210.5	215.5
17	488.5	493.5
20 - 21	506.5	517.5
27	548.5	553.5
29	560.5	565.5
31	572.5	577.5
33 - 36	584.5	607.5

In addition to the above the frequency band 216 – 217 MHz has been requested to allow use of a wireless IFB (interruptible fold back) system. These devices are used to send cueing and other instructions to ear pieces used by those involved in broadcast production.

Also included in the request are the 600 MHz guard band frequencies (614 – 617 and 652 – 663 MHz) for wireless microphone usage.

The following microwave frequencies are also being requested to support use of portable video camera transmitters that operate in the 1.4 to 6.5 GHz frequency bands. Hardware limitations prevent operation of these cameras in spectrum reserved for broadcast auxiliary operations. Additionally, operation of these low power transmitters (1.0 W) on broadcast auxiliary frequencies is not spectrally efficient considering the possible need for spectrum by local broadcasters to cover this event.

Requested Microwave Frequencies

1439.0, 1448.0, 1457.0, 1466.0, 1475.0, 1484.0, 1493.0, 1502.0, 1511.0, 1520.0, 2155.0 - 2180.0, 2170.0, 2178.0, 2186.0, 2194.0, 2210.0, 2222.0, 2234.0, 2246.0, 2258.0, 2270.0, 2282.0, 2364.0, 2373.0, 2382.0, 2391.0, 2405.0 - 2495.0, 2504.0 - 2646.0, 2905.0 - 3095.0, 3550.0 - 3700.0, 5730.0 - 5870.0, 6430.0, 6438.0, 6446.0, 6455.0, 6463.0, 6471.0, 6480.0, 6488.0, 6496.0, 6505.0, 6513.0, 6521.0 MHz

Finally -182 UHF frequencies from the Industrial/Business Radio pool are requested to provide logistical support at the event.

A large number of frequencies have been requested due to the magnitude of the event and the likelihood that not all of the frequencies will be available at any given time in that they are shared with other users.

It is noted that the equipment makes and models that have been listed in the application are representative of what is expected to be used. However, equipment with specifications that match or are within the limits of the listed equipment may be substituted as needed.

It is further noted that the requested powers and bandwidths are the maximum that might be needed, but typically lower values are used.

For some of the frequencies a large number of transmitters have been requested. In view of the magnitude of the event it is likely that a large number of portable transmitters may be required and the number requested represents what we believe to be the maximum number that may be needed.

Although the request encompasses a 5 km radius of the venue, most all of the operation will be restricted to the area in and around the arena.

All operation at the event will comply with the guidelines established by the Election Wireless 2021 Committee (EW2021) who has previously requested to be appointed as the special frequency coordination for the event. A copy of the EW2021 request for special coordinator and guidelines is attached below.

Mr. Louis H. Libin
Chair, *Election Wireless 2021* Committee
louislibin@broad-comm.com

April 2, 2020

BY ELECTRONIC FILING AND DELIVERY

Ms. Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Subject: Broadcast Coverage and RF Spectrum/Frequency Coordination for:

- 2020 Democratic National Convention (Milwaukee, WI August 5-23, 2020)
- 2020 Republican National Convention (Charlotte, NC, August 12-29, 2020)

Dear Ms. Dortch:

The attending delegates at the 2020 Democratic National Convention (DNC) and 2020 Republican National Convention (RNC) will choose and nominate the Presidential and Vice-Presidential candidates of each party for the 2020 Presidential election. In view of the intense anticipated press coverage of these events, the broadcast Network News Pool Organization has formed the ad hoc RF Spectrum and Frequency Coordination Committee known as *Election Wireless 2021* (herein “*EW2021*”) to serve both political conventions.¹ Mr. Louis Libin has been appointed the *EW2021* Committee Chair.

As outlined below, *EW2021* and the Network News Pool Organization respectfully seek the following approvals from the Federal Communications Commission:

- Appoint Mr. Louis Libin as the Designated Frequency Coordinator for both events.
- Authorize future applications for Special Temporary Authorizations (STA) for RF spectrum use at the both events.
- Temporarily waive the low power auxiliary station contour/distance separation requirements of Section §74.802 of the FCC Rules for both conventions to facilitate full coverage of these events of national interest.

¹ The Network News Pool Organization that sponsors *EW2021* includes ABC News (Network Pool Producer DNC 2020); CBS News (Network Pool Producer RNC 2020); CNN; FOX News; and NBC News. *EW2021* also includes representation from the Department of Homeland Security, Federal Communications Commission, and United States Secret Service.

Political conventions have historically been unique due to the sheer number of people and organizations requiring RF Spectrum Management to assure reliable operation of their wireless equipment.² For the following reasons, the need for effective RF Spectrum Management is now anticipated to be greater than ever. This year's political conventions will be the first following the transition from broadcast use of 600 MHz spectrum that was heavily utilized at prior conventions. Many new media organizations that didn't exist in 2016 will further add to the bandwidth demands. It is also anticipated that next-generation wireless equipment may be used during the various proceedings since the 2020 Political Conventions are expected to serve as a technology showcase and testbed for these new devices. This further demonstrates the need for an effective RF Spectrum Management program that will serve the needs of all wireless users.

As opposed to short-duration sporting events like the Super Bowl that have one prevalent rights-holding organization, there are no assigned broadcast "rights holders" for these events of such national importance. Instead, many participating networks, local radio and television stations, and other news-gathering entities are considered equals at the political conventions. Each of these entities will likely wish to make extensive use of wireless devices for coverage of these important and historic events. With such great demand, careful management of limited available spectrum is necessary to prevent harmful, mutual interference. Furthermore, unlike a short-duration sporting event, the political conventions will require interference-free wireless operations for extended periods of time at multiple locations at and near each venue.

The networks and other major content distributors require major wireless communications infrastructure along with RF spectrum to support their video, audio, and data transport needs. Public safety and multiple government agencies also have extensive wireless communications needs during these special events. *EW2021* will cross-coordinate and participate with local, state, and federal government agencies to help assure protection of vital communications infrastructure necessary for the safety and security of event participants and attendees.

In order to provide effective RF Spectrum Management, the primary goal of *EW2021* is to ensure pre-coordinated access to wireless spectrum within an established process of fair and equitable allocation of resources. Therefore, as discussed above, *EW2021* respectfully

² At this time, possible impact to the political conventions from the respiratory illness caused by the novel coronavirus known as COVID-19 is unknown. However, even if the events are only sparsely attended by the public due to ongoing "social distancing" requirements, great spectrum demands at the political conventions are still anticipated due to intense media coverage and other needs outlined below.

submits the following requests to the Federal Communications Commission for consideration at the DNC and RNC events:

1. The appointment of Mr. Louis Libin as the Designated Frequency Coordinator and single point of contact pursuant to Section 74.24(g)(2) of the FCC Rules.
2. Special Temporary Authorizations (STAs) for various RF spectrum, which will be submitted separately.
3. A waiver of the contour and distance separation requirement of Section 74.802 of the FCC Rules.

These requests are respectfully and jointly submitted on behalf of all domestic broadcasters and eligible entities licensed to operate in the United States. These requests are being submitted with the consent of the DNC and RNC Network News Pool Organizations as well as the DNC and RNC political party leadership. We respectfully ask that these requests be acted on expeditiously so that equipment can be procured and field-testing can begin as soon as possible. We further respectfully submit that grant of each of these requests would facilitate full coverage of these important events and thus would serve the public interest.

Request for STA and Waiver, Specific Bands, Locations, and Channel Requests

The request for STAs authorizing use of various spectrum bands to facilitate full coverage of the political conventions will be filed in April 2020 once the technical details for the request have been finalized.

In addition to specific frequencies and transmission parameters in the STA, *EW2021* herein seeks a waiver of the low power auxiliary station contour and distance separation requirements of FCC Rule Section 74.802(b)(1) during the times and in the geographic areas identified below.³ In particular, *EW2021* requests that the Commission waive Section 74.802 to permit the use of low power auxiliary stations, not to exceed 2 watts of power—with most operations using power levels of 200 milliwatts or lower, on channels allocated for television broadcasting where the nearest operating television station transmitter is located at least 40 kilometers from the event venues listed below.⁴ The pertinent information for each event follows:

1. The **2020 Democratic National Convention**
 - Fiserv Forum, 1111 Vel R. Phillips Ave., Milwaukee, WI
 - 43° 2' 42" N, 87° 55' 03" W (NAD 83)
 - August 5, 2020 – August 23, 2020⁵

³ 47 C.F.R. § 74.802(b)(1).

⁴ Notwithstanding the requested waiver, *EW2021* may also utilize spectrum that strictly complies with §74.802.

⁵ These dates include 12 days of pre-event testing and three days of post-event operations.

2. The **2020 Republican National Convention**

- Spectrum Center, 333 E. Trade St., Charlotte, NC
- 35° 13' 30" N, 80° 50' 21" W (NAD 83)
- August 12, 2020 – August 30, 2020⁵

The Commission's rules may be waived for good cause shown.⁶ *EW2021* respectfully submits that grant of the requested waiver would facilitate full coverage of the political conventions, events of great national interest, and thus would serve the public interest. Indeed, this request is consistent with waivers of Section 74.802 that the Commission has granted for every political convention since 2004.⁷ In light of the foregoing, *EW2021* requests that the Commission expeditiously grant the request for waiver of the contour and distance separation requirement of Section 74.802.

Studies and Measurements

In support of these requests, working directly in conjunction with the FCC along with ongoing cooperative participation of Network News Pool Organization and local broadcasters alike, *EW2021* has recently completed a detailed on-site RF spectrum analysis and related RF spectrum measurements at each venue site.

Upon request, *EW2021* will present our measurements and analysis to the FCC. Additional measurements will be performed at each venue before and during operations to help assure interference-free operations to quickly identify and eliminate any problems that should arise.⁸

Questions or correspondence concerning this request may be directed to the undersigned.

⁶ 47 C.F.R. § 1.3; see also *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969); *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

⁷ See, e.g., *Auxiliary Broadcast Frequency Coordinator Designated for the Republican National Convention in Cleveland, Ohio, the Democratic National Convention in Philadelphia, Pennsylvania, and the Presidential Inauguration in Washington, DC; Grant of Waiver of Separation Requirements of 47 C.F.R. § 74.802 and Special Temporary Authorizations*, Public Notice, DA 16-766 (WTB/MB rel. July 5, 2016).

⁸ This is particularly important due to the ongoing TV Incentive Auction 600 MHz spectrum repack. Because many stations are operating with temporary facilities or have reported construction delays due to COVID-19, the television bands are in a great deal of flux.

Ms. Marlene H. Dortch
April 1, 2020
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Respectfully submitted,



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cc: Hon. Ajit Pai, FCC Chairman
Hon. Michael O'Rielly, Commissioner
Hon. Brendan Carr, Commissioner
Hon. Jessica Rosenworcel, Commissioner
Hon. Geoffrey Starks, Commissioner
Ms. Michelle Carey, Bureau Chief, Media Bureau
Mr. Donald Stockdale, Bureau Chief, Wireless Telecommunications Bureau
Mr. Ron Repasi, Acting Chief Engineer, Office of Engineering and Technology

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April 1, 2020
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