

# BOOTH, FRERET, IMLAY & TEPPER, P.C.

ATTORNEYS AT LAW

ROBERT M. BOOTH, JR. (1911-1981)  
JULIAN P. FRERET (1918-1999)  
CHRISTOPHER D. IMLAY  
CARY S. TEPPER

NIELS S. QUIST\*  
\*ADMITTED IN NEW YORK

7900 WISCONSIN AVENUE  
SUITE 304  
BETHESDA, MD 20814-3628

TELEPHONE: (202) 686-9600  
FACSIMILE: (202) 686-7797  
BFITPC@AOL.COM

SILVER SPRING OFFICE:  
14356 CAPE MAY ROAD  
SILVER SPRING, MD 20904-6011

TELEPHONE: (301) 384-5525  
FACSIMILE: (301) 384-6384

October 29, 2003

Via E-mail and U.S. Mail  
jburtle@fcc.gov  
bfranca@fcc.gov

Mr. Jim Burtle, Chief  
Experimental Licensing Branch  
Office of Engineering and Technology  
Federal Communications Commission  
445-12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

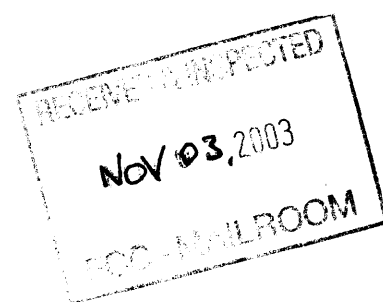
Bruce Franca, Deputy Chief  
Office of Engineering and Technology  
Federal Communications Commission  
445-12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: Experimental Authorization, File No. 0122-EX-PL-2003;  
Broadcast Sports, Inc.; Request for New Experimental Facility;  
Provision of Additional Information to Permit Grant; Your  
Reference Number 2652.

Gentlemen:

This letter is with reference to the above-referenced application for a new experimental authorization. I have spoken with Mr. Franca about this application, which was dismissed without prejudice by your letter of July 28, 2003. We reached the understanding that, provided that certain additional information is provided concerning the development of new video production hardware and techniques by Broadcast Sports, Inc. that had been developed pursuant to prior iterations of this Experimental License, the application could be reinstated and granted.

We also agreed to the deletion of the proposed use of PCS bands in any experimental authorization grant, in the 1850-1990 MHz band. Though that band was included in prior Experimental Authorizations, Broadcast Sports was unable to make use of it due to difficult real-time coordination issues.



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Broadcast Sports has developed, and regularly has implemented at sporting events, especially televised motor sports events and golf competitions, the following products and services:

1. Sound effects microphones for golf events, which provide to the viewing audience a more comprehensive audio experience, similar to attending the event in person.
2. A roving commentator system for talk back for both golf and automobile racing events, which did not exist previously.
3. Return video systems for golf camera operators, which enable the camera operators to evaluate their shots from the viewer's perspective, increasing the professionalism of the production effort.
4. Roving cameras for golf. Without these pole-mounted RF cameras, developed by Broadcast Sports, the viewer would be limited to the portion of the competition at the holes where wire can be strung.
5. Video cueing for commentators in car racing, providing for a more seamless transition from car racing shots to the commentator.
6. Basic transmission of the in-car camera systems. This is the largest R&D effort that Broadcast Sports has conducted. It not only developed itself, but refined substantially, using the experimental frequency bands, the in-car RF cameras, both forward looking and rearward looking, placing the viewer in a series of cars during automobile racing events. The transmission of these RF camera signals to a production truck and for satellite uplinking involves techniques developed by Broadcast Sports as well, but principally, the design of the RF cameras is both unique and dependent on the availability of the bands in the experimental authorization.
7. Transmission of video from America's Cup Yachts. Due to the simultaneous movement of the yachts and the helicopters relaying the video signals in three planes at once, the synchronizing of the RF camera transmission was uniquely challenging.
8. Helmet mounted cameras for downhill BMX events at Summer X games.
9. Cameras mounted on skiers during Winter X games.
10. Cameras mounted on snowmobiles for Winter X games.
11. Sky diving cameras for summer X games.

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12. Sideline cameras for NFL football games.

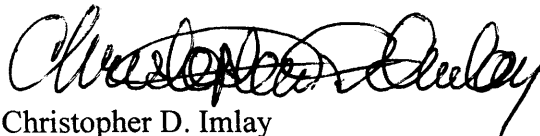
Items 8 through 12 required substantial Research and Development efforts for these cameras due to the punishing environment. All of these devices were developed by Broadcast Sports, Inc. using the bands set forth in the Experimental application, which were permitted by prior experimental authorizations.

Details about these matters can be provided at your request. However, it is submitted that Broadcast Sports, Inc. has well over a million dollar annual R&D budget, and the bands requested in this application are each and all necessary to facilitate the cutting-edge technological development of this preeminent video production company.

Broadcast Sports, Inc. would be pleased to provide you with a tour of its facilities at Odenton, Maryland (just off Md. Route 32 in Anne Arundel County) at your convenience, to demonstrate the use of the requested bands in their R&D effort. In the meantime, however, the need for this experimental license grant is urgent, and we would be grateful for any assistance you might provide in reinstating this application and granting it.

Please contact the undersigned counsel with respect to this matter, and with any questions.

Yours very truly,



Christopher D. Imlay

Cc: Peter Larsson