

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 Democratic National Convention that is scheduled to take place at the Time Warner Cable Arena in Charlotte, NC between September 3, and September 6, 2012. In order to allow for setup and testing plus some use immediately following the convention the STA request covers the period from August 31, 2012 through September 7, 2012.

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.

REQUESTED FREQUENCY RANGE (MHz)			REQUESTED FREQUENCY RANGE (MHz)		
CHANNEL	LOWER FREQUENCY	UPPER FREQUENCY	CHANNEL	LOWER FREQUENCY	UPPER FREQUENCY
7	174.5	179.5	30	566.5	571.5
8	180.5	185.5	31	572.5	577.5
9	186.5	191.5	32	578.5	583.5
10	192.5	197.5	33	584.5	589.5
12	204.5	209.5	35	596.5	601.5
13	210.5	215.5	36	602.5	607.5
14	470.5	475.5	41	632.5	637.5
17	488.5	493.5	42	638.5	643.5
18	494.5	499.5	43	644.5	649.5
19	500.5	505.5	45	656.5	661.5
20	506.5	511.5	46	662.5	667.5
24	530.5	535.5	48	674.5	679.5
26	542.5	547.5	49	680.5	685.5
29	560.5	565.5	51	692.5	697.5

The following microwave frequencies are 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. In addition, AFTRCC coordination has been requested for those frequencies that fall within their prevue.

Requested Microwave Frequencies

1435 - 1525, 2170, 2178, 2186, 2194, 2306, 2350, 2365 - 2385, 2394, 2504 – 2646, 6431.5, 6456.5 and 6487.5 MHz

Finally -186 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 top 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 16 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 Political Conventions Communications Committee (POLCOMM2012) who has previously requested to be appointed as the special frequency coordination for the event. A copy of the POLCOMM2012 request for special coordinator and guidelines is attached below.

FILED/ACCEPTED

APR - 4 2012

Federal Communications Commission
Office of the Secretary

April 4, 2012

BY MESSENGER

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
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Subject: Broadcast Coverage of and RF Spectrum and Frequency Coordination for

- 2012 Republican National Convention (St. Pete Times Forum, Tampa, FL, August 27-30, 2012)
- 2012 Democratic National Convention (Time Warner Cable Arena and Bank of America Stadium, Charlotte, NC, September 2-5, 2012)
- Presidential Inauguration and Related Activities (Washington, DC, January 20-26, 2013)

Dear Ms. Dortch:

The attending delegates at the Republican and Democratic National Conventions will choose and nominate the Presidential and Vice Presidential candidates of each party for the 2012 Presidential election. The election will be followed by the Presidential Inauguration in late January 2013, in Washington, D.C. In view of this series of events, the broadcast networks have formed an ad hoc RF Spectrum and Frequency Coordination Group, called POLCOMM-2012, to serve as the Frequency Coordinating Committee for the 2012 Political Conventions and Presidential Inauguration, as has been done in past years. The undersigned, Louis Libin, has been appointed the Chair of POLCOMM-2012 by the Network News Pool Organization, and it is therefore requested that the Federal Communications Commission appoint him as the Special Frequency Coordinator and RF Spectrum Manager for these events.

The 2012 Political Conventions are both unique events. What's different about the 2012 Political Conventions, as compared to other large events, is the sheer number of people and

organizations in attendance who require the use of wireless equipment. It's anticipated that next generation wireless devices may also be used during the various proceedings. Unlike an event of short duration, the Political Conventions will require interference-free wireless operations for an extended period of time, in multiple locations, which necessitates the implementation of RF Spectrum Management.

For these events of such national importance, there are no assigned broadcast "rights holders," as opposed to events where there is only one prevalent rights-holding organization. Each participating network, local radio and television broadcasters, and other news gathering entities are all considered "rights holders," and they make extensive use of wireless communications in their coverage of these important events. The many new media organizations will add to the very crowded user base.

The networks and other major content distributors require major wireless communications infrastructures along with RF spectrum to support their video and audio transport. Additionally, public safety and government agencies also have extensive wireless communications needs during these special events.

Additionally, the 2012 Political Conventions may also serve as a technology showcase for new and advanced wireless devices, further demonstrating the need for an effective RF Spectrum Management Program which serves the needs of all wireless users at these events.

In order to provide effective RF Spectrum Management, the goals of POLCOMM-2012 are to ensure pre-coordinated access to wireless spectrum within an established process of fair and equitable allocation of resources.

POLCOMM-2012 submits the following requests to the Federal Communications Commission for consideration:

1. Special Temporary Authorizations (STA) for various RF spectrum use at the Republican National Convention in Tampa, Florida, and the Democratic National Convention in Charlotte, North Carolina. Furthermore, these STA requests would also cover the related events leading to the Presidential Inauguration in late January 2013 in Washington, DC;
2. A waiver of the distance separation requirement of Section 74.802 of the FCC Rules; and
3. As discussed above, the appointment of Louis Libin to act as the Special Frequency Coordinator and RF Spectrum Manager for these events as permitted under Part 74.24 of

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the Rules for a period beginning August 13, 2012, and ending on January 26, 2013, after the anticipated conclusion of the Presidential Inauguration events in Washington, D.C.

These requests are respectfully and jointly submitted on behalf of all domestic broadcasters licensed to operate in the United States. These requests are being submitted with the consent of these broadcasters, as well as the Democratic and Republican Political Party leadership. We respectfully ask that this request be acted on expeditiously so that equipment can be procured and field-testing can begin as soon as possible.

Specific Band and Channel Requests

The request for STA for the political conventions will be filed in early April 2012, once the details for the request have been finalized. For the Presidential Inauguration, the STA will be filed in September 2012. In addition to specific frequencies and transmission parameters, and consistent with the requests submitted and granted by the Commission for coverage of the nominating conventions in 2004 and 2008, the request will ask for a waiver of the distance separation requirements of Section 74.802. This will allow the broadcasters to operate low power auxiliary stations at events in Tampa, Florida; Charlotte, North Carolina; and Washington, DC, on bands allocated for TV broadcasting where television stations on those channels are located at least 40 kilometers from each venue. The low power to be used is not expected to exceed 2 watts output, and in the majority of cases, operational RF power output levels will be within 100 to 200 milliwatts under most conditions.

Studies and Measurements

In support of these requests, POLCOMM-2012, working in conjunction with the FCC along with ongoing cooperative participation of national broadcast networks and local broadcasters alike, have recently completed a detailed on-site RF spectrum analysis and performed related RF spectrum measurements at each venue site listed below.

Upon request, POLCOMM2012 will present to the FCC our measurements and analysis. Additional measurements will be performed at each venue to assure interference-free operations. The reference coordinates for each venue are as follows:

Tampa, FL: 27-56-36 N 082-27-11W (NAD 83) / Republican National Convention

Charlotte, NC: 35-13-30 N, 080-50-21 W (NAD 83) / Democratic National Convention

Washington, DC 38-53-22 N, 077-00-39 W (NAD 83) / US Capitol

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Washington, DC 38-53-51 N, 077-02-11 W (NAD 83) / White House

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

Respectfully submitted,

/s/ Louis Libin

Louis Libin
Chairman, POLCOMM2012
2012 Political Conventions Frequency Coordination Committee

cc: Chairman Julius Genachowski
Commissioner Robert McDowell
Commissioner Mignon Clyburn
William Lake, Chief, Media Bureau
Rick Kaplan, Chief, Wireless Telecommunications Bureau
Julius Knapp, Chief, Office of Engineering and Technology