

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 Wells Fargo Center Philadelphia, PA between July 25 and July 28, 2016. In order to allow for setup and testing plus some use immediately following the convention the STA request covers the period from July 11, 2016 through July 29, 2016.

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.

CHANNEL	REQUESTED FREQUENCY RANGE (MHz)	
	LOWER FREQUENCY	UPPER FREQUENCY
8	180.5	185.5
9	186.5	191.5
13	210.5	215.5
15	476.5	481.5
18	494.5	499.5
21	512.5	517.5
39	620.5	625.5
40	626.5	631.5
43	644.5	649.5
51	692.5	697.5

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.

The following microwave frequencies are also being requested to support use of portable video camera transmitters that operate in the 2.1 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

2170, 2178, 2186, 2194, 2394, 2504 – 2646, 6430.0, 6438.0, 6446.0, 6455.0, 6463.0, 6471.0, 6480.0, 6488.0, 6496.0, 6505.0, 6513.0 and 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 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 (ElectionWireless2017) who has previously requested to be appointed as the special frequency coordination for the event. A copy of the ElectionWireless2017 request for special coordinator and guidelines is attached below.

Louis H. Libin
Chairman
ElectionWireless2017

May 10, 2017

BY MESSENGER

Marlene H. Dortch, Esq.

Secretary

Federal Communications Commission

445 12th Street, SW

Washington, DC 20554

Subject:

Broadcast Coverage of and RF Spectrum and Frequency Coordination for the 2016 Republican National Convention (Quicken Loans Arena, Cleveland, OH, July 18-21, 2016), and the

2016 Democratic National Convention (Wells Fargo Center, Philadelphia, PA, and the Philadelphia Convention Center, Philadelphia, PA, July 25 – 28, 2016), and the

Presidential Inauguration and Events (Washington, DC, January 18-21, 2017)

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 2016 Presidential election. The election will be followed by the Presidential Inauguration in late January 2017, 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

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ElectionWireless2017, to serve as the Frequency Coordinating Committee for the 2016 Political Conventions and 2017 Presidential Inauguration, as has been done in past years. The undersigned, Louis Libin, has been appointed the Chair of ElectionWireless2017 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 2016 Political Conventions are both historic and unique events. What's different about the 2016 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 to cover all the news associated with these events. 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. There are more applications to use wireless equipment at these conventions than ever before.

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 2016 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 ElectionWireless2017 are to ensure pre-coordinated access to wireless spectrum within an established process of fair and equitable allocation of resources. The Committee (EW2017) will be on-site for all the specified events.

ElectionWireless2017 submits the following requests to the Federal Communications Commission for consideration:

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1. Special Temporary Authorizations (STA) for various RF spectrum use at the Republican National Convention in Cleveland, Ohio, and the Democratic National Convention in Philadelphia, Pennsylvania. Furthermore, these STA requests would also cover the related events leading to the Presidential Inauguration in late January 2017 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 the Rules for a period beginning August 13, 2017, and ending on January 21, 2017, 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 television and radio 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 May 2016, once the details for the request have been finalized. For the Presidential Inauguration, the STA will be filed in September 2017. 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 2012, 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 Cleveland, Ohio; Philadelphia, Pennsylvania; 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, ElectionWireless2017, 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.

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Upon request, ElectionWireless2017 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:

Cleveland, OH: 41-29-48 N 81-41-18 W (NAD 83) / Republican National Convention (Quicken Loans Arena, 1 Center Court, Cleveland, OH)

Philadelphia, PA: 39-54-05 N 75-10-19 W (NAD 83) / Democratic National Convention (Wells Fargo Center, 3601 South Broad St. Philadelphia, PA)

Philadelphia, PA: 39-57-18 N 75-09-35 W (NAD 83) / Democratic National Convention (Philadelphia Convention Center, 1101 Arch St. Philadelphia, PA)

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

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

Respectfully submitted,

/s/ Louis Libin

Louis Libin

Chairman, ElectionWireless2017

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cc: Chairman Tom Wheeler

Commissioner Mignon Clyburn

Commissioner Jessica Rosenworcel

Commissioner Ajit Pai

Commissioner Michael O'Rielly

William Lake, Chief, Media Bureau

Jon Wilkins, Chief, Wireless Telecommunications Bureau

Julius Knapp, Chief, Office of Engineering and Technology