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June 6, 1997

Via Hand Delivery

Experimental Licensing Branch
New Technology Development Division
Office of Engineering and Technology
2000 M Street, N.W. Suite 269
Washington, D.C. 20554

Attention: Mr. Paul Marrangoni, Chief

Re: Final Analysis, Inc.;
Experimental License WA2XHE;
File No. 5582-EX-PL-976

Dear Mr. Marrangoni:

This office represents the Society of Broadcast Engineers, Inc., which sponsors the national Part 74 volunteer frequency coordination program. The work of local volunteer Part 74 frequency coordinators is critical to the successful sharing of Part 74 Broadcast Auxiliary bands among broadcast licensees, and other radio services which share the same bands.

Some time ago, when John Morgan was Chief of your Branch, SBE representatives and the undersigned met with John and Kimberly Baum, who was at that time also in the Experimental Licensing Branch. We asked that, at the time STAs or Experimental Licenses which propose the use of broadcast auxiliary bands are granted, there be placed in the experimental license or STA a condition that, prior to commencement of operation or any modified operation, the holder of the experimental or STA authority be required to contact the local Part 74 coordinator, if any, in the area. Mr. Morgan agreed that this should be regular policy, so as to permit an accurate database of users in the Part 74 bands, and to prevent interference incidents. He and Ms Baum were in agreement about this and assured us that it would be future policy of the Experimental Licensing Branch.

To facilitate the process, SBE regularly delivers to Commission staff updated lists of local Part 74 coordinators, which includes the address, telephone and fax numbers of the coordinators, and the markets they serve. SBE has that information at its web site as well (www.sbe.org).

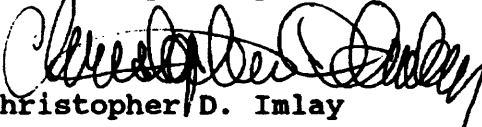
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We have had occasion to review a grant of an Experimental License to Final Analysis, Inc., with the above-captioned call sign and file number. That license, despite the fact that it permits uplinks to a LEO satellite at 159 watts in the 455-456 MHz band in the Washington metro area, shows no coordination or notification requirement. There are many, many users of that broadcast auxiliary band in the Washington area, including aircraft and helicopters doing traffic reporting and other broadcast related two-way communications. The band is heavily used regularly. There will inevitably be interference from this facility to broadcasters, absent advance and real-time coordination. I notice that this experimental application was coordinated with WTB and IB prior to grant, but not with the Mass Media Bureau.

Therefore, the Society of Broadcast Engineers requests that the captioned experimental license be modified to include a coordination requirement before commencement of operation of the facility, and prior to each subsequent initiation of tests. The ostensible purpose of this authorization is to determine compatibility with existing users and operations in the designated spectrum. In order to do so, it would seem useful to coordinate the test operations with the principal incumbent users.

Please contact the undersigned with any questions about the foregoing.

Yours very truly,


Christopher D. Imlay

cc: Mr. Dane Ericksen, SBE
Mr. Howard Fine, SCFCC
Mr. Terry Baun, SBE
Mr. John Poray, SBE
Mr. Ray Benedict, CBS
Peter A. Batacan, Esquire