



**ARRL** *The national association for*  
**AMATEUR RADIO**

**Office of the President**  
**225 Main St.**  
**Newington, CT 06111**

December 12, 2008

Bill Caldwell, President  
Central States VHF Society

Re: FCC Allocation for the 70 MHz band

Dear Bill:

Thank you for your November 22, 2008 letter requesting ARRL pursue an amateur allocation at 70 MHz.

As an avid VHF'er and Life Member of CSVHFS, you know I share the societies desire to expand the privileges available to U.S. radio amateurs.

Even though full power commercial broadcast television stations will be reocating early next year there is still considerable spectrum activity that will continue in the region that would adversely impact amateur radio communciations and the FCC would not be receptive to a spectrum allocation petition from the Amateur Radio Service for this region.

As a VHF enthusiast, I am well-aware of the benefits to the Amateur Service that would accompany a domestic allocation at 70 MHz. I am also aware of the rather long list of Region 1 countries that permit Amateur operation at 70 MHz. My concern is that a proposal for an allocation domestically for Amateur Radio is not at all practical; it would not succeed; and it would therefore unnecessarily, and with no offsetting benefit, alienate the broadcast industry and put the Amateur Service in an adversarial posture relative to the domestic broadcast service (which has been an ally in recent years in several contexts). Here is why:

1. The band 68-72 MHz is allocated in Region 2 to the Broadcast Service on a primary basis, with a secondary allocation for Fixed and Mobile Services. In Mexico and several other Region 2 countries, it is used on a footnote basis for fixed and mobile purposes. The domestic allocation of the 54-72 MHz band is for broadcasting, and more specifically television broadcasting and broadcast

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auxiliary operation. Domestic footnotes permit wireless microphones in this band, subcarrier broadcast and non-broadcast operations, and for subscription television operations.

2. There is a common misconception circulating among radio amateurs that the DTV conversion now scheduled for mid-February, 2009 will result in a bonanza of vacant television channels, which are fair game. That is not so. The DTV conversion works this way: television channels 52-69 disappear, and are reallocated to commercial broadband and public safety. All television stations, low power television stations, Class A television stations and Television translators all must migrate to the remaining channels, 2-51. Channel 4 is not allotted in many markets for full power digital television, but it surely enough will be used for low power television, Class A television, and television translators. There is now no obligation of low power television stations to convert to digital operation. They are in the process of migration downward pending displacement from channels 52-69. The result of this migration is that there are no vacant television channels in Los Angeles, New York, and several other large markets.

3. Broadcasters formerly utilized wireless microphones especially, and low power broadcast auxiliary operations generally, for production of programs at remote locations, in the 698-806 MHz band (Channels 52-69). All of those wireless microphones will have to cease operating in that spectrum after the DTV conversion. The manufacturers of those mics, Shure, Sennheiser, and the like, are looking for replacement spectrum for wireless microphones, which are now clustered in the channels below 698 MHz. These are 200 kHz bandwidth devices, and what few vacant television channels there are below Channel 52 will have to accommodate displaced wireless mics and other broadcast auxiliary operation. The principal location for these is at 54-72 MHz (TV channels 2, 3 and 4).

4. The FCC recently issued the long-expected "TV White Spaces" 2<sup>nd</sup> Report and Order, which allows broadband access devices on a fixed and portable basis in the "unused" television channels, of which there frankly are none. The idea is to permit devices with RF sensing and in some cases GPS positioning circuitry to operate in bands used for Television broadcasting and auxiliary operation. However, the FCC has always excluded channels 2-4 from this proposal, because those channels are used for or are adjacent to the output frequency of TV interface devices such as VCRs and DVD players and recorders, and satellite and cable terminal devices. FCC claims that the interference potential precludes operation of White Spaces Devices in these channels.

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5. The broadcast service has allied with the Amateur Service in some cases recently, including the BPL proceeding. We have similar interests relative to Part 15 devices. Because this relationship is valuable in spectrum defense for the ARRL, and because, given the above, there is virtually no chance in our view that an Amateur allocation in the vicinity of 70 MHz would be seriously considered, much less proposed, by FCC, there is in our view every reason not to propose such an allocation, and no good reason to do it. There may come a time when over-the-air television broadcasting is no longer viable, but that time is not now.

I would urge CSVHFS, which has a good deal of credibility, to focus its attentions on identifying other candidate allocations, a process in which we would be interested in participating. To file a petition seeking access to 70 MHz spectrum now, I believe, would be an ill-fated deployment of that credibility.

Thanks again for your letter, Bill. I have shared it with the ARRL Board for review and consideration.

Sincerely 73,

Joel Harrison, W5ZN  
President

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