



LAND MOBILE COMMUNICATIONS COUNCIL

January 11, 2022

Via Email: hillary.denigro@fcc.gov

Ms. Hillary DeNigro
Deputy Bureau Chief
Media Bureau
Federal Communications Commission
45 L Street, N.E.
Washington, DC 20554

Re: LPTV Channel/Market Flexibility

Dear Ms. DeNigro:

The Land Mobile Communications Council (LMCC)¹ noted an article in the December 28, 2021, issue of Communications Daily with this headline: LPTV Broadcasters Want More Flexibility on Station Moves. The article quotes a representative of the Advanced Television Broadcasting Alliance as stating there are indications the FCC will allow greater flexibility for broadcasters to switch channels and markets, perhaps through a new filing window.

The LMCC supports increased regulatory flexibility generally and has no objection to it in this instance. However, in light of recent issues involving broadcast and land mobile stations, the LMCC expects any proposed changes to LPTV channels or locations will be scrutinized carefully for compliance with the following FCC rules:

- Rule Section 73.687(e)(4)(ii): requires TV permittees for Channel 14 to “install filters and take other precautions as necessary, and submit evidence that no interference is being caused” to land mobile operations before it will be permitted to transmit programming.

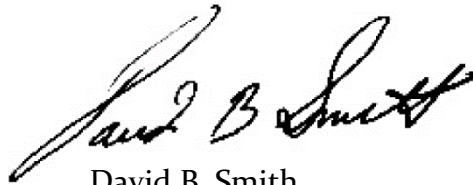
¹ LMCC members include the American Association of State Highway and Transportation Officials; American Automobile Association; American Petroleum Institute; Association of American Railroads; Association of Public-Safety Communications Officials-International; Aviation Spectrum Resources; Enterprise Wireless Alliance; Forest Industries Telecommunications; Forestry-Conservation Communications Association; Government Wireless Technology & Communications Association; International Association of Fire Chiefs; International Municipal Signal Association; MRFAC, Inc.; Telecommunications Industry Association; The Monitoring Association; Utilities Technology Council; and Wireless Infrastructure Association.

- Rule Section 73.623(e): specifies that “the Commission will not accept petitions to amend the DTV Table of Allotments, applications for new DTV stations, or applications to change the channel or location of authorized DTV stations that would use channels 14-20 where the distance between the DTV reference point as defined in section 73.622(d), would be located less than 250 km from the city center of a co-channel land mobile operation or 176 km from the city center of an adjacent channel land mobile operation.”

The LMCC reminds the FCC of the second rule, in particular, since a number of adjacent channel DTV stations on the current list of broadcast stations requiring protection from land mobile systems² are closer than permitted under that rule and were granted without waiver.

We appreciate your attention to these matters as the FCC considers what greater flexibility might be accorded to LPTV broadcasters.

Sincerely,

A handwritten signature in black ink, appearing to read "David B. Smith". The signature is fluid and cursive, with a large initial "D" and "S".

David B. Smith
President

cc: David Furth
Roger Noel

² Wireless Telecommunications Bureau and Public Safety and Homeland Security Bureau Update List of TV Stations to be Protected in the T-Band, *Public Notice*, 36 FCC Rcd 4224 (WTB/PSHSB rel. Feb. 17, 2021.).