Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Improving Public Safety Communications in the 800 MHz Band	)	WT Docket No. 02-55
	)	
Consolidating the 800 and 900 MHz Industrial/Land Transportation and Business Pool Channels	)	
	)	
Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, including Third Generation Wireless Systems	)	ET Docket No. 00-258
	)	
Amendment of Section 2.106 of the Commission's Rules to Allocate Spectrum at 2 GHz for use by the Mobile Satellite Service	)	ET Docket No. 95-18

To: Chief, Office of Engineering and Technology

SUPPLEMENT TO
JOINT REQUEST CONCERNING THE BAS RELOCATION

Sprint Nextel Corporation (Sprint Nextel), the Association for Maximum Service Television, Inc. (MSTV), the National Association of Broadcasters (NAB), and the Society of Broadcast Engineers (SBE) (collectively, the Joint Parties) respectfully supplement their December 31, 2009, "Joint Request Concerning The BAS Relocation" (the "Joint Request").

In the Joint Request, the Joint Parties identified nine Designated Market Areas ("DMAs") that would require until August 9, 2010 to relocate due to adverse weather conditions, installation constraints, and other circumstances beyond the Joint Parties' control.[1] The Joint Request also advised the Commission that other DMAs would require additional time to

[1] These nine markets are: (1) Anchorage, Alaska; (2) Portland, Oregon; (3) Eugene, Oregon; (4) Medford-Klamath Falls, Oregon; (5) Bend, Oregon; (6) Indianapolis, Indiana; (7) Ft. Wayne, Indiana; (8) Lafayette, Indiana; and (9) Albuquerque, New Mexico.

relocate; however, the Joint Parties explained that the unpredictable nature of the final stages of the relocation process prevented them from identifying exactly which of the remaining DMAs would conclude the transition prior to February 8, 2010 and which would require additional time. At the time of their original filing, therefore, the Joint Parties indicated that they would supplement their Joint Request once additional time permitted a more granular assessment of which markets need additional time to conclude the relocation process.

The Joint Parties are now pleased to announce that, of the 42 DMAs remaining in transition at the time of the December 2009 Joint Request, the BAS operators in 14 DMAs will have concluded retuning by February 8, 2010 and require no additional time;[2] the BAS operators in another 15 DMAs – or 54 percent of all the DMAs for which relief is now sought – are projected to complete the transition by the end of March following the February "sweeps" periods used to determine television station ratings; the BAS operators in 4 DMAs are projected to complete the relocation in April; the BAS operators in an additional 7 DMAs are projected to complete the relocation in June after the May "sweeps" period; and the BAS operators in only 2 DMAs may require the full scope of time through August 9, 2010 that the Joint Parties originally sought to complete their transitions. Even in the 28 markets that remain, moreover, nearly two thirds of the individual stations in those markets are prepared to relocate as soon as other stations in the same or adjacent markets finish their installations.

Appendix A identifies each of the DMAs that require additional time to conclude the relocation, provides detailed information on the factors that have affected the transition for each DMA, and offers a market-specific timeline to conclude the transition to frequencies above 2025 MHz.

[2] The Cincinnati, OH DMA (#32) relocated February 1, 2010.

As documented in the BAS Progress Report filed contemporaneously with this request, Sprint Nextel and the BAS community have nearly concluded the BAS transition. More than 93 percent of all BAS incumbents have completed the installation of all of their replacement equipment, and the vast majority of markets have completed the transition to the new band plan. In a small number of markets, however, the transition continues to raise unique challenges and complexities that are outside the control of Sprint Nextel and BAS licensees.[3] Extending the relocation deadline on a market-specific basis should provide the last remaining BAS operators the additional time necessary to overcome the well-documented challenges associated with the final stages of the transition and complete it without disrupting free over-the-air news, sports, weather, and other public interest programming.

Respectfully submitted,

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[3] See Joint Request, pp. 8-13, which discusses in detail these unique challenges and complexities.

APPENDIX A

Markets projected to relocate in February 2010:

- **St. Louis, MO (DMA #21):** Three stations in this market did not receive truck transmitters until the first of December, and they have just finished installing them. One station was not able to schedule commencement of central receive site installation until January 4, 2010. The station's Chief Engineer has coordinated a February 16, 2010, relocation date with the other stations in the market, provided their installations are complete.

- **Minot-Bismarck-Dickinson, ND (DMA #152):** Market relocation at the end of January was delayed into February as a result of harsh weather conditions.

- **Missoula, MT (DMA #171):** All stations except one have relocated. They are all far enough apart that this has not created any operational problems. The last station is tied to the stations in the Butte-Bozeman, MT DMA where the winter weather has been extremely bad.

Markets projected to relocate in March 2010:

- **Columbus, OH (DMA #34):** One station has two more ENG trucks to self-install. A second station is waiting on a tower owner at one of its receive sites to complete structural tower work to accommodate the weight of the new steerable antenna that the station is installing. There is an outside possibility that both stations will finish before commencement of the February sweeps so that the market could relocate in early February; however, none of the stations in the market will relocate during sweeps, so it is more likely that the market will relocate in March after completion of the sweeps.

- **Buffalo, NY (DMA #44):** All three stations had to delay installation work for about 3 months because the tower manager for a receive site required revisions to site leases to undertake the relocation work. The installer cannot return until mid-February, weather permitting, and installation will take roughly two weeks.

- **Lexington, KY (DMA #66):** This market is tied to the Louisville, KY DMA for relocation, and, like Louisville, it is not willing to relocate during the February sweeps. In addition, one station has had some configuration problems with its equipment, and the installer has left the market while the problems are resolved. The installer will return once the equipment is re-configured and re-sent (on schedule for shipping on January 27). Furthermore, two other commonly-controlled stations have had significant equipment problems, coupled with installer delays. They are not yet finished installing the last of their fixed links.

- **Dayton, OH (DMA #56):** This is a "last in market" situation. The installer has started on the ground work, but has not yet scheduled the tower work. The installer has advised that if it can locate a tower crew, then the station is willing to allow installation in February during the sweeps. Ice has created problems for tower climbing.

● **Des Moines-Ames, IA (DMA #70):** One installer was supposed to install most of the stations in the market (4 of 6). As of the first of the year, the installer had not scheduled any of them. Two of the stations changed installers, and one was completed on January 25. The other station is substantially complete, but still has a few configuration problems. A third station is self-installing and has a few configuration issues, but this station is willing to relocate with the others even if it is not finished trouble-shooting. The market will not relocate during the February sweeps.

● **Honolulu, HI (DMA #71):** One station received its equipment at the end of September. Installation was started at two stations right after the November sweeps, and stopped for two weeks over the holiday period (as most installations did). Installers struggled for several weeks trying to upgrade three (3) antenna sites. Ultimately, because of the age and condition of these antennas, Sprint decided to pay to replace them. The antennas are being shipped, and the installers will resume installation on February 1 (the stations are willing to have them installed during the February sweeps). Installation should take about 2 weeks. Relocation will be the first week in March after the sweeps period has ended, unless the entire market is willing to relocate as soon as the installation is complete.

● **Cedar Rapids-Waterloo-Iowa City-Dubuque, IA (DMA #90):** One station received its ENG truck transmitters at the end of December 2009. The station has not been able to get its installer of choice to schedule an install date until just recently. Installation is currently set for March 8, 2010, and it should take a week or two. Another station lost its receive site, and it has been working on a new tower lease in Iowa City, which is now complete. That station plans on installing during February.

● **Tri-Cities, TN-VA (DMA #92):** This is a "last in market" situation. The other stations have been ready to relocate since mid-October. Equipment for the last station was delivered at the end of November. The Chief Engineer bench-tested all of it during December, and he realized that some of it needed to be returned to the manufacturer for updating before it could be configured properly for installation. The station prefers to self-install its equipment and does not want to install during the February sweeps.

● **Evansville, IN (DMA #98):** Only one station remains to be installed. This station is one of the last installations that the installer has scheduled. The station has had several configuration problems with its equipment. The manufacturer is conducting trouble-shooting, and the installer will have to return once the equipment is corrected and sent back to the station. The manufacturer has provided no projected delivery date. Another station is also still waiting on its installer, who estimates installation at the end of February, but installation at this station is not necessary for relocation of the market, because it does not currently use its 2 GHz equipment.

● **Ft. Wayne, IN (DMA #103):** This is a "last in market" situation. The station has been waiting on its installer, who has pushed the schedule back 6 times in the last 6 months due to scheduling problems and lack of personnel. The station hopes to schedule installation in February, and it is willing to install during the February sweeps. It remains to be seen whether the rest of the market will agree to relocate during the February sweeps period. If not, they will do so after February sweeps.

● **Sioux City, IA (DMA #144):** This is a "last in market" situation. The last of the station's equipment was shipped on January 22, 2010. The installer has done a partial install and needs to return to install the last central receive site. The weather currently prohibits tower work, so installation is on hold.

● **Butte-Bozeman, MT DMA #190):** The stations are working on the installations (self-install), but the winter weather has been brutal. They have been doing the best they can. The links are spread out over hundreds of miles, and some are tied to the Missoula market. They are currently *snowshoeing* some 2 GHz equipment to sites that even snowcats cannot reach.

Markets projected to relocate in April 2010:

● **Indianapolis, IN (DMA #26):** One station received, on January 20, the equipment for one of its receive sites; however, it will not install the equipment during the February sweeps. It will begin self-installing immediately after sweeps. Two stations have the same installer, and both have been put off several times. The current schedule is for installation to commence March 15 and to take two to three weeks. A fourth station has had a number of equipment and configuration problems, and the installer has been rather slow. They are almost finished installing, but a few configuration problems remain.

● **Lafayette, IN (DMA #194):** This one-station market has been installed since June of 2009, but is close enough to Indianapolis that they have to relocate together to avoid interference.

● **Davenport, IA – Rock Island-Moline, IL (DMA #88):** This is a "last in market" situation. The station received its equipment in early December, and has a very small staff. The station has refused offers of outside help and is insistent on doing the install itself. The station indicates that it will be another 30-60 days before it is finished. The rest of the market has been ready to relocate since early November. Because of close proximity, this market must relocate with the Cedar Rapids market.

● **Wausau-Rhinelander, WI (DMA #136):** Ice, strong winds and winter weather have delayed installation work that must be done at one site used by two stations in the market.

Markets projected to relocate in June 2010:

● **Portland, OR (DMA #23):** There are a number of stations in Portland that are not completely finished. Two stations in the Oregon Public Broadcasting system have had equipment and installer troubles. Installation is to take at least another 30-60 days. Another station has had to wait for its installer to complete installation at three (3) sites. Two other stations have other small items for their installer to finish, which should be completed by February 1. Another station is waiting on the phone company to install DSL lines for its remote control system before its installer can return to hook up the control system. The Portland, Eugene, Medford-Klamath Falls and Bend markets must relocate together.

● **Eugene, OR (DMA #122):** One station does not yet have an installation date from its installer. Tentative dates are for some time in February. This station's equipment did not ship until late November. Another station has been self-installing for some time, and it has had significant problems with its equipment, and with the installation of a specialized out-of-band system. As noted above, Eugene must wait for the other markets in Oregon to relocate.

● **Medford-Klamath Falls, OR (DMA #142):** The relocation of this market is impacted by a very large 5-station mega-relocation effort (4 full-power stations and one Low Power TV station) that incorporates some 50 fixed links throughout Oregon and extreme Northern California. They have

some particularly difficult and ingeniously engineered mountain-top installations feeding remote translators that have had to be completely re-engineered (including geothermal generators to power sites when the solar power fails). Installer capability has been stretched. One station in the market has presented a particularly interesting problem. The station was verified, and, in 2006, it signed off on its scrubbed 2 GHz equipment inventory. The equipment arrived in September, and when the installer arrived in early January 2010 to install the equipment, it was found that none of the equipment sent was appropriate for the application. The station is being completely re-verified beginning January 25, 2010, and the equipment engineering and procurement process will have to start over. Further delays could occur if the manufacturer does not have what the station needs in stock. Further, as noted above, Medford-Klamath Falls must wait for the other markets in Oregon to relocate.

● **Bend, OR (DMA #200):** This is a "last in market" situation. The station is part of a complicated 3-station network for Oregon Public Broadcasting, which stretches all over the state. The installer has taken a very long time to schedule and complete this job. Installation will take another 30-60 days at least. Furthermore, this is an especially large complicated job. As noted above, Bend must wait for the other markets in Oregon to relocate.

● **Spokane, WA (DMA #78):** One station has complicated remote-controlled camera systems involved in the relocation process. The manufacturer and installer are trying to resolve problems encountered with the installation of these systems. Another station has a very complicated and highly unique control system. Installation of this control system has encountered numerous technical and budgetary problems, prompting work stoppages by the installer. This installation problem has also delayed relocation of a fixed link associated with another co-located station. The latter station's equipment has been installed but cannot be turned on until the former station's installation is complete. Winter-weather issues have complicated installations at many of the mountain sites in the market.

● **Yakima-Pasco-Richland-Kennewick, WA (DMA #124):** Two stations in this market are sister stations of the station in the Spokane market with the very complicated and highly unique control system. Together the three stations participate in a video and control network. They are having the same developmental and installation issues as their sister station in Spokane.

● **Rochester, MN-Mason City, IA-Austin, MN (DMA #153):** All three stations are still installing. One station has not yet scheduled installation with its installer. The Chief Engineer has no staff and has had a difficult DTV installation and other problems. A second station has asked for and received approval on DSL lines for its control system, as its current 2-wire circuits will not handle the high-speed data traffic. However, this station has not yet confirmed that it has reached out to the data company to get the DSL lines installed. The equipment installer will need to return to hook up the control system once the DSL lines are in place. A third station is self-installing. The entire market is impacted by winter weather conditions for the foreseeable future.

Markets projected to relocate in July 2010:

● **Albuquerque-Santa Fe, NM (DMA #49):** Seven of the stations in the market are complete and ready for relocation. Three stations have a 52-link system throughout the state. That equipment was not delivered until early November. Meanwhile, the installer was busy installing elsewhere. The installer commenced work in early January and is working until February sweeps begin, at which point it must stop. Installation will resume after completion of the February sweeps. Furthermore,

installation has been difficult due to winter weather conditions in the New Mexico mountains. Some of the fixed-link installations will be installed but not put on line because they will interfere with installations for the New Mexico public television stations. Sprint has delivered to the three New Mexico public television stations (KNME, KENW, and KRWG) all of their Frequency Relocation Agreement materials, including the various FRA Schedules. The stations are in the process of reviewing these materials. Once these five outstanding FRAs are executed, then these stations can submit purchase orders and initiate other relocation efforts.

- **Anchorage, AK (DMA #155):** One incumbent received its equipment in late December, but all of the sites are currently inaccessible. Furthermore, another station has not had a full-time Chief Engineer for 6 months. The station now has a part-time chief who is trying to address and resolve problems inherited from his predecessor. Some of this station's equipment had to be returned to the manufacturer to be upgraded, and it has just been received back by the station. The rest of this station's equipment has not yet been delivered with no current due date from the manufacturer. That manufacturer has not been actively involved in and is not overly familiar with the 2 GHz relocation project.