

Roger Doering, Engineer
The Camp Verde TV Club, inc
420 W Angus Dr
Camp Verde, Az 86322

FCC
Public Comments
Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions

As an engineer I am in favor of new technologies and better services to the public, However, the proposal to shift television spectrum to wireless companies while it is touted as expanding economic and innovation, it is causing harm to one technology in favor of another. America is to be “One nation under God, with liberty and justice for all.” Taking away the liberty of television broadcasters in favor of wireless companies is not in keeping with these principles.

Other spectrum can be used for wireless, leaving the television band for television to grow and improve its service and at the same time provide a place for wireless to grow and thrive.

Granted only those stations who elect to participate in the auction are involved, however, they are not looking at the long term impact to television which has just gone to a great deal of effort to convert to digital. The spectrum is already tight and difficult for stations to find displacement channels when dealing with interference and other issues. Should broadcasters lose further spectrum, it reduces the opportunities for new players to participate and provide diversity of service to their communities. Full power and Low power stations alike would be negatively impacted when new services arise which create interference and they need to find an open channel. Television has already given up much of its spectrum such that its future is jeopardized through this auction process.

The wireless industry needs spectrum for its services, yes, but not at the expense of television broadcasters. In the initial proposal asking for increased spectrum for wireless and broadband technologies, there were several blocks of spectrum identified. The television band is needed for television to grow and expand its services and time to look at other spectrum. There may be a particular broadcaster willing to give up part of their spectrum, but they are not looking out for the interests of the broadcast industry as a whole should they do so. Other broadcasters need that spectrum to grow and provide for diversity and new programming to their communities. Should part of the television band be auctioned, it should revert to broadcasters in 5 years as broadcasters of the future will need the space. Granted wireless will also be needing more space in that time, making it

obvious that in order for both services to exist, wireless needs spectrum outside the television band, giving room for both technologies to expand their opportunities.

Cordially submitted,

Roger Doering