

NATIONAL FOOTBALL LEAGUE
Super Bowl LVIII® and related events, January 25 through February 13, 2024
Within 7 kilometers of Allegiant Stadium, Las Vegas, Nevada
Special Temporary Authorization Request

This STA request will facilitate the conducting of the NFL Super Bowl® at and near Allegiant Stadium, 3333 Al Davis Way, Las Vegas, NV 89118, and the operations and logistics of arrangements and news broadcasting before and briefly after this extremely large-scale sporting event, beginning January 25, 2024 when installation of RF equipment by NFL contractors is scheduled to commence. This year, it is necessary to start the STA operations for this year's game well in advance of the Super Bowl football game (which occurs on February 11, 2024), because the uses of the frequencies sought by this STA include security and operations communications: preparation work that begins on or about January 25, 2023. Las Vegas is also a congested market in the UHF frequency range, and extensive on-site advance spectrum monitoring and advance spectrum management is required.

As well, there are extensive pre-game related events in the days leading up to February 11, 2024. These include major, televised events associated with the Super Bowl within a 7-kilometer radius of the Allegiant Stadium. The coordinates of the Stadium, where the game will be played, are as follows: 36° 05' 26" N, 115° 11' 02" W. The street address of the Stadium is 3333 Al Davis Way, Las Vegas, NV 89118.

The STA proposes the use of UHF spectrum as follows: 403-450 MHz; 470-608 MHz; and 614-698 MHz). This is more spectrum than is normally sought for Super Bowl events in past years, but land mobile spectrum at UHF is very crowded in this market, and careful advance coordination is required in order to avoid interference to licensees in the area. There is a historic shortage of wireless microphone spectrum at past Super Bowl events, and as well in this market for narrowband two-way communications for coordination of broadcast video production efforts, security, operations and for medical personnel. Most operation on any of these channels will be inside the stadium, at or near playing field level, which offers a very high degree of signal attenuation immediately outside the stadium. The NFL Event Frequency Coordination Group has determined, after consulting with the Frequency Coordinator for the Las Vegas television market affiliated with the Society of Broadcast Engineers (SBE) that there will be no interference to any television receiver in the band 470-608 MHz from the low-power broadcast auxiliary and two-way radio STA operation in the Stadium or in the vicinity, where broadcast network operations will be established. Measurements taken by the NFL Event Frequency Coordination staff at the Stadium are available, which will ensure that no television interference will occur. Nevertheless, interference testing will commence in January to determine whether any over-the-air television receiver outside the Stadium could receive interference from the proposed operations. If interference potential is determined during these tests, no frequencies within the channel at issue will be used.

Members of the NFL Event Frequency Coordination Group will be on site and will conduct real-time frequency monitoring and frequency coordination operations

throughout the STA period, to preclude any interference on any of the requested frequencies to mobile broadband facilities, or to television broadcast, broadcast auxiliary or other affected users. Also involved in real-time coordination is the local broadcast market frequency coordinator under the volunteer system sponsored by the Society of Broadcast Engineers, Incorporated, as has been done for many years for this event.

Similar STA grants have regularly and consistently been issued by the Commission to accommodate the NFL Super Bowl in past years (See, e.g. WB9XOU, file numbers 0496-EX-ST-2003 and 0002-EX-ST-2005; WC9XUY, file number 0901-EX-ST-2006; WD9XBT, file number 0510-EX-ST-2007; WD9XQM, file numbers 0602-EX-ST-2008, and 0524-EX-ST-2009; WE9XQR, file numbers 0602-EX-ST-2010 and 0795-EX-ST-2011; WH9XEU, file number 1165-EX-ST-2013; WI9XCX, file number 1146-EX-ST-2014; WJ9XGR, file number 1345-EX-ST-2015, 1773-EX-ST-2016, 1794-EX-ST-2017; WK9XRR, file number 2078-EX-ST-2018, WP9XWN, file number 2278-EX-ST-2019; WR9XJM, file number 1814-EX-ST-2020), WT9XCP, file number 1871-EX-ST-2021, and WU9XRH, file number 2036-EX-ST-2022).

The instant STA application specifies a maximum of 250 units to be deployed, but the number will likely be less than 250. That maximum number of units was granted by the Commission in previous years for the Super Bowl.

The active participation at the event by the NFL Event Frequency Coordination Group has avoided RF interference complaints at the past 27 Super Bowls through active, advance and real-time, on-site frequency coordination. The participation of the broadcast auxiliary frequency coordinator for the Las Vegas broadcast market will ensure that there is no interference in that broadcast market at this upcoming event. Any interference that cannot be immediately resolved will result in cessation of operation of the affected mobile operations on site.

Mr. Steward Albert of the NFL's Event Frequency Coordination Group will act as the "Stop Buzzer" contact on site. His telephone number on-site is (704) 507-4987 and his e-mail is Steward.Albert@nfl.com. Otherwise, any information can be obtained from communications counsel for the applicant who can serve as an additional Stop Buzzer contact:

Christopher D. Imlay
Booth, Freret & Imlay, LLC
14356 Cape May Road
Silver Spring, Maryland 20904-6011
301-384-5525 office telephone
301-384-6384 facsimile
301-351-3795 mobile
chris@imlaylaw.com
chris.imlay@gmail.com