



The

Broadcasters' Desktop Resource

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Focus on Regulation

FCC Clarifies Part 74 Coordination Rules

[October 2010] All of us have had occasional questions about how to interpret “FCC Speak.” Unfortunately, the FCC is reluctant to make many things clear, until some enforcement or other written petition is accepted. In this case a group of broadcast engineers did get the FCC to say something – and it may help you.

It has been some time since the FCC changed Part 74 of the Broadcast Auxiliary Rules to require PCN (Prior Coordination Notification) for any new STL applications, replacing the old local Frequency Coordinator system. Between the new costs and the existing frequency congestion in many places, more than a few stations have opted in the past few years for Internet or unlicensed frequencies.

Still, many stations still operate STLs on frequencies where PCN is required, especially for fixed point-to-point microwave systems such as in the 950 MHz band. It is important to avoid some of the traps that can create issues with the Enforcement Bureau.

PCN WHEN?

Most folks know that before you can apply for some of these Part 74 frequencies, you must first conduct the PCN to identify any potential interference problems that may be caused by you or to you (from existing licensees).

On the other hand, it was not clear from the Rules whether another PCN was needed if a “minor change” was made to a fixed point-to-point microwave system. Another question that has been raised by engineers is how to deal with an ambiguity about whether a Form 601 needs to be filed after such a minor change is made.

In order to get clear guidance on the issue, a group called the *Engineers for the Integrity of Broadcast Auxiliary Services Spectrum* (EIBASS) filed a request for what are called “Declaratory Rulings” (DR) with the FCC in November 2009. The FCC did issue Declaratory Ruling late this month. While the answer may not be exactly what was desired, it does make things clearer.

PCN ALWAYS

The FCC Declaratory Ruling, DA 10-2042, is dated October 25, 2010, and can be found on the FCC’s web site at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-10-2042A1.pdf

In summary, the answer is: Yes, although a showing of a completed PCN is not needed before filing for a most minor changes, with a couple of exceptions, PSN is always needed to be done. A 601 filing also is required after the change is completed.

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