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VIA ELECTRONIC FILING

January 30, 2007

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington D.C. 20554

**Re: Comments of Radio-Television News Directors Association  
Unlicensed Operation in the TV Broadcast Bands  
ET Docket No. 04-186**

Dear Ms. Dortch:

On behalf of the Radio-Television News Directors Association ("RTNDA"), I am submitting these comments to encourage the Commission to more fully examine and consider the consequences of allowing unlicensed devices in the broadcast television band. The most stringent testing standards should be placed on these unlicensed devices to ensure that they will not impair the ability of *licensed* users of this spectrum to serve the public interest. Specifically, RTNDA encourages the Commission to study the real-world effects of these unlicensed devices on wireless microphones, an essential tool of news professionals.

RTNDA is the only professional organization exclusively serving the electronic news profession. It is comprised of more than 3,000 news directors, news associates, educators and students.

Wireless microphones are one of the most important tools used by electronic journalists for covering breaking news events. Wireless microphones are low-powered devices that operate on the so-called vacant television broadcast channels in a market. However, the use of this spectrum by wireless microphones is *licensed*, and subject to extensive frequency coordination. This pre-coordination is vitally important when emergency situations arise and wireless microphones must work immediately. As "first informers" during critical situations, many involving health and safety, the ability of RTNDA's members to disseminate information to the public cannot be compromised by equipment that is subject to interference.



RTNDA encourages the Commission to proceed with extreme caution in further authorizing unlicensed devices to operate in this spectrum. The Commission should conduct extensive real-world tests of these devices. Specifically, the impact of these unlicensed devices on the licensed frequency used by wireless microphones should be studied in depth. Once these unlicensed devices enter the marketplace, it will be impossible to counteract the potentially disastrous effects of these devices on the ability of electronic journalists to cover breaking news events. The Commission has committed to protect the rights of licensed users of this spectrum. Therefore, RTNDA strongly encourages the Commission to carefully test and evaluate the impact these unlicensed devices will have on wireless microphones and if necessary adopt rules to protect the operation of these devices that operate on licensed frequencies.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara Cochran". The signature is fluid and cursive, with the first name "Barbara" written in a larger, more prominent script than the last name "Cochran".

Barbara Cochran  
President