

As shown by Figures 1–3, the filter has more than 60 dB of attenuation in the AWS band, but only 1.3 dB of attenuation across TV BAS Channel A7d (2,097.5–2,109.5 MHz). All this in a filter that is only two rack units high. As shown by Fig. 4, the AWS band is immediately above the 2 GHz TV BAS band.

# To its credit, T-Mobile has taken seriously its obligation under Section 27.1133 of the FCC Rules, which requires



Fig. 2: Front view of the CMT AWS band reject filter. ©CMT, used with permission

newcomer AWS operators to protect 2 GHz Part 74 and Part 78 operations. This means being prepared to retrofit an earlierin-time ENG-RO site that is located close to an AWS base station with one of these remarkable CMT band reject filters. In some cases, additional filtering of the AWS base station's out-of-band emissions (OOBE) may also be necessary, pursuant to Section 27.53(h) of the FCC Rules, although so far the dominant interference mechanism has been BFO and not OOBE. Part 27 of the FCC Rules is called the "Miscellaneous Wireless Communications Service," (really, that's its name); AWS stations come under Subpart L of those rules; thus, when an up to 1,640-watt equivalent isotropic radiated power (EIRP) AWS base station fires up too close to an existing ENG-RO site, the TV station operator may think that the site's performance has "gone to L."

#### ABC REPORT



Fig. 3: Rear view of the CMT filter. CMT, used with permission

Chicago area above 1-GHz BAS frequency coordinator, wrote a thorough study, "T-Mobile AWS Filter Implementation Progress Report," regarding the effectiveness of the CMT filter. It documented that the filter was effective in eliminating BFO from a nearby AWS base station. Equally important, the report showed that the filter's group

In December 2008, Craig Strom, assistant director of

engineering for Chicago ABC affiliate WLS-TV, and the

delay across TV BAS Channel A7d did not degrade digital ENG signals. This is of critical importance, because while analog FM video ENG signals are relatively forgiving of group delay errors, digital signals tend to be much more sensitive to varying group delay across an ENG channel.

And the more sharply tuned that a filter becomes, then usually the more extreme are the group delay changes near the filter's edge. Therefore the report's testing of multiple modes of digital ENG operation, and conclusion that the filter did not degrade those operations, was a finding of great importance.

## SBE PETITION

SUMMARY

In September 2005, the Society of Broadcast Engineers filed what became RM-11308, a Petition for Rulemaking with the FCC. SBE asked that the Universal Licensing System (ULS) be modified to allow (but not require) TV Pickup licensees to enter the location(s) and height(s) of their ENG-RO sites into the ULS, so that it could be searched on a frequency/pointradius basis by any interested party. A year ago, the FCC adopted SBE's proposal, so now the ULS can show TV Pickup licensees' ENG-RO sites.

Why should all TV Pickup licensees with ENG-RO sites run, not walk, to the ULS to register their sites? Because doing so makes it more likely that a newcomer AWS operator will be able to determine in advance the locations of such sites, and either avoid constructing an adjacent-band AWS base station in close proximity, or, if this cannot be avoided, to at least give the ENG-RO site operator a heads up, and conduct interference tests before the AWS base station gets placed into regular operation. This is important because once an AWS cell goes from the equivalent of equipment tests to program tests, and subscribers get used to having service provided by that cell, reducing the cell's power, or relocating the cell, becomes less likely. It's the classic case of an ounce of prevention is worth a pound of cure.



DRL = Data Return Link

All frequencies and bandwidths are in MHz.

Fig. 4: The re-farmed 2,025–2,110 MHz TV BAS band. The AWS band is immediately above the 2 GHz TV BAS band, with only the 0.5 MHz upper data return link (DRL) band between an AWS base station and TV BAS Channel A7d. ©CMT, used with permission

These are "interesting times" for 2 GHz TV BAS operations; other services want a piece of the 2 GHz band with its favorable propagation characteristics. To keep a station's ENG operations viable, some of the receive sites will probably have to be retrofitted with an AWS band reject filter, and all of the ENG-RO sites should be registered in the ULS. Although this means filing an FCC Form 601 modification application to add these sites to the TV Pickup license, doing so would be prudent in this writer's opinion.

Finally, kudos to ABC, Mr. Craig Strom, T-Mobile, and of course CMT.

Dane E. Ericksen, P.E., CSRTE, 8-VSB, CBNT, is a senior engineer with Hammett & Edison Inc., San Francisco. He has served multiple terms on the SBE national board, chaired the SBE FCC Liaison Committee from 1987–2007 (now SBE Government Relations Committee), and chairs the ATSG TSG S3 Specialist Group on Digital ENG. He can be reached at dericksen@h-e.com.

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