

Request for Waiver of the Displacement Freeze

Pursuant to the *Incentive Auction Task Force and Media Bureau Set Forth Tools Available to LPTV/Translator Stations Displaced Prior to the Special Displacement Window*, Public Notice, DA 17-584 (June 14, 2017), Nebraska Educational Telecommunications Commission (“NET”) respectfully requests waiver of the current freeze on the filing of translator displacement applications (see *Freeze on the Filing of Applications for Digital Replacement Translator Stations and Displacement Applications*, Public Notice, 29 FCC Rcd 6063 (MB 2014)). This application seeks to change TV translator K46FG-D, Falls City, Nebraska to channel 25 due to displacement by T-Mobile’s impending use of the 600 MHz band.

NET received letter notification from T-Mobile stating that K46FG’s use of its current channel will be displaced by T-Mobile 120 days from July 27th, 2017, the date of the letter. T-Mobile references its obligation to provide advance notification as is required by FCC regulation, 47 CFR §73.3700(g)(4).

A waiver of the Displacement Freeze will serve the public interest by allowing K46FG to operate on an available channel, thus maintaining its educational TV services to the local community and eliminating any potential interference it may cause to T-Mobile’s service on channel 46. The attached OET 69 analysis shows that NET’s operation on channel 25 will not cause interference above the threshold level set by Commission staff.

As required by the June 14, 2017 Public Notice referenced above, the T-Mobile letter is attached to this request for waiver as page #2 and #3.



VIA CERTIFIED MAIL & EMAIL

July 27, 2017

NEBRASKA EDUCATIONAL TELECOMMUNICAT
1800 N 33rd St
Lincoln, NE 68503

RE: Notification of Intent to Begin 600MHz Operations

Dear K46FG-D/ Facility ID:47970 Licensee:

T-Mobile USA, Inc. ("T-Mobile") is notifying you that T-Mobile is preparing to commence operations on its 600MHz spectrum in the Partial Economic Area ("PEA") # 317 by 11/27/2017 and your station is likely to cause harmful interference to T-Mobile's operations.

To determine if your station(s) is likely to cause interference, an interference analysis has been performed, as specified by the Federal Communications Commissions' ("FCC") Inter-service Interference procedures¹, using publicly available information in the FCC's Licensing and Management System ("LMS") for your facility. This analysis predicts field strength at T-Mobile's base station and user equipment locations in the PEA # 317 market from your facility. The FCC has set the thresholds at which the predicted field strength from low power TV and translator stations creates a sufficient interference risk to wireless facilities. T-Mobile has determined that your facility exceeds those thresholds and is an interference risk to its wireless operations.

T-Mobile will commence its operations in the PEA # 317 market on 11/27/2017. This letter provides the 120 days' advance notification required by FCC regulations, 47 CFR §73.3700(g)(4).

¹ See 30 FCC Rcd 12049, 12071, para. 49 (2015)

The FCC regulations also require you to cease operations or eliminate the potential for harmful interference to T-Mobile's wireless facilities in the PEA # 317 market.

The FCC will work with you to attempt find a new television channel outside of the new 600 MHz mobile band that will not interfere with T-Mobile's network. You should review the FCC's Tools Available to LPTV/Translator Station Public Notice (enclosed) released on June 14, 2017 and contact Hossein Hashemzadeh, Melvin Collins, or Barbara Kreisman at the FCC for more information about the options available in your area.²

Please email 600MhzFC@T-Mobile.com once you have determined when you will eliminate the interference. If you would like additional information regarding our findings or if it might be possible to coordinate our operations, please submit a request to Dan Wilson, Sr. Manager, Spectrum Engineering, at 600MhzFC@T-Mobile.com.

Sincerely,

/s/ Dan Wilson

Sr. Manager, Spectrum Engineering, T-Mobile USA, Inc.

² See <https://www.fcc.gov/document/iatf-mb-set-forth-tools-available-lptvtranslator-stations>