

### **Request for Special Temporary Authorization**

TV Translator Station K46FG-D, Falls City, NE (Facility ID 47970)

Pursuant to *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, MB Docket No. 16-306, GN Docket No. 12-268 (June 14, 2017), and Sections 74.780 and 73.1635 of the FCC's Rules, Nebraska Educational Telecommunications Commission ("NET"), licensee of noncommercial educational TV translator Station K46FG-D, Falls City, Nebraska, respectfully requests Special Temporary Authorization ("STA") to operate the station in accordance with the technical parameters proposed in its pending channel 25 displacement permit application in FCC File No. 0000029188 (copy attached).

NET filed the channel 25 displacement modification application to seek relief for K46FG-D following receipt of a notification letter from T-Mobile regarding its planned use of the 600 MHz band (copy attached). T-Mobile's letter indicates that it will commence its operations in the K46FG-D market on November 27, 2017 and that K46FG-D is likely to cause harmful interference to T-Mobile's operations. In the June 14, 2017 Public Notice referenced above, the FCC set forth tools for use by TV translators such as K46FG-D displaced by 600 MHz band wireless operations, including the filing of a displacement permit application/freeze waiver<sup>1</sup> accompanied by an STA application.

In accordance with those procedures, NET now seeks STA to operate its Falls City, Nebraska TV translator on channel 25 as proposed in the recent displacement application and while that application remains pending in anticipation of the Special Displacement Window.<sup>2</sup> The attached displacement application in File No. 0000029188 demonstrates that the proposed channel 25 facility complies with the FCC's technical and interference rules.

NET respectfully submits that a grant of STA will serve the public interest by allowing the continued operation of K46FG-D on its newly proposed and available channel despite the station's displacement from its licensed channel due to the impending 600 MHz band wireless operations in its area. NET is a governmental entity and a noncommercial educational licensee and operates K46FG-D on a noncommercial educational basis.

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<sup>1</sup> See *Freeze on the Filing of Applications for Digital Replacement Translator Stations and Displacement Applications*, Public Notice, 29 FCC Rcd 6063 (MB 2014) (*Displacement Freeze Public Notice*).

<sup>2</sup> See *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, MB Docket No. 16-306, GN Docket No. 12-268 (June 14, 2017).



**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 procedures<sup>1</sup>, 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).

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<sup>1</sup> 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.<sup>2</sup>

Please email [600MhzFC@T-Mobile.com](mailto: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](mailto:600MhzFC@T-Mobile.com).

Sincerely,

/s/ Dan Wilson

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

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