



Township of Woodbridge

Department of Police
Robert J. Hubner, Director
Joseph M. Nisky, Deputy Director

Mayor John E. McCormac, CPA

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COPY

August 9, 2012

Via electronic mail and USPS

Luis Salazar, PhD
Acting District Director
Enforcement Bureau
Federal Communications Commission
201 Varick Street
Suite 1151
New York, New York 10014

Re: Co-Channel 16 HDTV Interference to Public Safety Communications in
the 482-488 MHz band segment- Call Sign WQMI704

Dear Dr. Salazar:

This letter is written in support of the interference complaint filed by the City of New York, Department of Information Technology and Telecommunications, addressing public safety communications in the TV channel 16 (482-488 MHz) band. Woodbridge, New Jersey, licensed under call sign WQMI704 to use channel 16 frequencies in the New York Metropolitan area, experienced harmful interference to its radio system commencing on or about June 28, 2012, the time period noted by New York City. Information indicates that the harmful interference is transmitted by co-channel facilities of WTSD-CA located in Philadelphia, Pennsylvania.

Woodbridge's authority under WQMI704 to use channel 16 frequencies is based on its geographic location in the New York metropolitan area. Woodbridge lies directly across the Arthur Kill, the tidal strait separating Staten Island in New York City from New Jersey. The Arthur Kill channel is approximately 16 km long and 1000 meters wide, connecting Raritan Bay on its south end with Newark Bay on the north. The Outerbridge Crossing spans the Arthur Kill connecting Perth Amboy, New Jersey, a participant in Woodbridge's system, with Staten Island.

Woodbridge's interference experience is consistent with that of the New York City agencies as detailed in its complaint and supporting information. During the time period referenced by the complaint, several sites of Woodbridge's trunked public safety system were subject to such harmful interfering signals to result at one point in a total loss of communications capability on channel 16 frequencies. Significant disruption continued throughout the time period referenced until the location of the transmitter was determined and the offending facility turned off.

Woodbridge Police Department officers have had extensive discussions with New York City representatives in a coordinated effort to discern the source of the interference. We have examined the



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work and analysis detailed in the complaint prepared by New York City personnel and the observations presented. We agree with the conclusions presented to the Commission as to the source of the interference and the critical need for remedial and mitigation efforts. In particular, broadcast operations on TV channel 16, WTSD-CA, degraded Woodbridge's system performance significantly.

Failure to remedy this interference places Woodbridge's police and emergency services and those of the system's participating jurisdictions at risk of not being able to communicate. The current environment compromises the safety of citizens and responding officers.

Woodbridge acknowledges and appreciates the efforts of WTSD-CA representatives to examine the circumstances and in working toward a resolution. Yet, Woodbridge joins New York City in requesting that TV Channel 16 WTSD-CA cease operations until it can demonstrate compliance with the non-interference obligations of the Commission's rules. TV Channel 16 WTSD-CA facilities present interference constituting clear and imminent danger to Woodbridge's public safety network and the law enforcement and emergency service responsibilities it serves. Operations should cease until WTSD-CA demonstrates it can coexist with the public safety communications networks and operations on channel 16 in the New York City Metropolitan area.

Please call upon me if I can provide additional information.

Respectfully,

Captain Scott Kuzma
Commanding Officer
Information and Technology Systems
Woodbridge Police Department
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Copy to:

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