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NABA Technical Committee

Sub-Committee on Spectrum

Position on the Use of Spectrum for Broadcasting

It is NABA's position that:

The use of radio-frequency spectrum by broadcasters remains an important vehicle for the efficient and scalable delivery of high-quality media content and emergency alerting services to both fixed and mobile audiences, specifically relying on the following services and systems;

DTV Broadcasting Service

Any spectrum reallocation associated with the broadcasting services, specifically at VHF (54 – 88 MHz and at 174 – 210 MHz) and UHF frequencies (470- 698 MHz), must continue to preserve the spectrum bandwidth allocation and the protected service area of existing DTV assignments, where such stations wish to continue to operate an over-the-air service using a full bandwidth 6 MHz broadcast channel.

Contiguous spectrum should be allotted in the bands assigned to the broadcast service to allow for the robust delivery of high-quality media content, data and signaling that meets or exceeds the capabilities of current fixed and mobile reception and display devices as well as those that are expected to be deployed in the future.

Radio Broadcasting Service

The AM (535 – 1605 kHz) and FM (88 – 108 MHz) radio broadcasting bands must continue to be allocated to the Broadcasting Service in North America as a primary allocation. Radio broadcasting continues to be a ubiquitous and highly-effective service, essential to the public for the dissemination of news, information and public safety information.

Electronic News Gathering (ENG) Systems

The spectrum currently allocated in the 2 GHz, 7 GHz, 13 GHz and 15 GHz bands for terrestrial electronic news gathering in North America must continue to be allocated for this use. Broadcasters depend on such ENG systems to be able to immediately collect from the field to production centers and then broadcast breaking news events,

including emergency alerting, to the general public. The current spectrum allocation in the 2 GHz band is inadequate to meet the existing requirements of broadcasters in many markets who rely on this spectrum to cover news and keep their local communities informed. Reduction of this spectrum allocation would result in significant loss in broadcaster's capability to deliver vital news and information to their viewers.

Satellite Distribution Systems

The use of spectrum allocated at C-Band (3.7 – 4.2 GHz downlink and 5.925 GHz to 6.425 GHz uplink) and at Ku-band (11.7 GHz to 12.2 GHz downlink and 14.0 to 14.5 GHz uplink) in the Fixed-Satellite Service is essential to North American broadcasters' operations. Systems employing these FSS bands have been extensively deployed in North America over decades, primarily for the distribution of content from network centers to affiliated stations, cable head-ends and to other receiving systems.

Direct-to-Home (DTH) or Direct Broadcasting Satellite (DBS) and Satellite Radio Systems

DTH or DBS systems, using either the 12.2 – 12.7 GHz Broadcasting Satellite Services band or Ku-band, are well established in North America with millions of deployed consumer terminals. Satellite Radio Systems, operating near 2.3 GHz, or S-band, have nearly 25 million subscribers. The spectrum must be protected for the continued use of these systems.

Related Systems

Wireless microphone and IFB (interruptible fold/feedback) systems are vital for broadcast operations, specifically for communications amongst field news reporters and their photographers, production or sports and entertainment programming and among network center and production field crews. Broadcasters in North America continue to require sufficient UHF spectrum for the continued interference-free operation of these systems.

Summary

NABA will continue to participate actively in spectrum studies of the radio-frequency bands both assigned and associated with broadcasting, in order to ensure the continued efficient use of these bands for broadcast media content distribution.

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