

9/7/62

## MEMORANDUM

TO: All ~~Institutional Members~~ of NAEB *MEMBER TELEVISION STATIONS*

SUBJECT: Position of NAEB on Notice of Proposed Rule Making, Docket No. 14744 of the Federal Communications Commission, Relative to the Establishment of a New Class of Educational Television Service in the 2000 Megacycle Band.

DATE: *SEPTEMBER 7, 1962*

The staff of NAEB in cooperation with its legal and engineering consultants has given serious consideration to the proposal by the FCC to establish a new educational television service in the 2000 megacycle band. This proposal is contained in the Notice of Proposed Rule Making, Docket No. 14744, and the deadline for comments from interested parties is September 17, 1962.

The proposal is supplemented by a report of an experiment carried on by a manufacturer and the FCC in the Union Free School District No. 18, at Plainedge, New York. The NAEB ~~has made~~ *will have* a report on the demonstration of this experiment in the Fall issue of the Journal. In the meantime, it has been necessary to review the potentials of this proposed service and to have our legal counsel present a comment reflecting the interests of the NAEB to the Commission. Station ~~KTPCA-TV~~ *WILL-TV* and Station ~~WENH-TV~~ *and* have indicated ~~a desire to~~ *intention to* file comments, and ~~undoubtedly~~ *may wish to do likewise* other member institutions ~~would like to add~~ their voices ~~to the commentary~~. For this reason, the general position of the NAEB, as it will be presented to the FCC, is herewith outlined for your information.

OF

(1) the two bands which have been tentatively proposed for the new educational television service, the NAEB feels that the television broadcast auxiliary band 1990 - 2110 megacycles is ~~the one preferred.~~ *preferred.*

There are many ~~established~~<sup>The</sup> engineering reasons for this: It is only a little more than twice the frequency of the upper UHF broadcast band, ~~and~~<sup>its</sup> propagation characteristics are very similar to UHF, and it has a better potential of control for wide band transmission.

(2) The NAEB feels that an additional educational service in the 2000 megacycle band providing twenty standard television channels is a highly desirable addition to the total educational service. However, ~~it must be understood that~~ such a service would be valuable only as an auxiliary service to provide on-the-air "closed circuit" transmission of on-campus and in-school programs where special reception facilities can be provided.

(3) There is no evidence to indicate that any proposed development in the 2000 megacycle band could take the place of any standard broadcast service or meet the presently established needs for standard broadcast channels.

(4) Studies conducted by the NAEB indicate that instructional television will increasingly require standard broadcast facilities for complete area coverage to serve the needs of students and teachers, as well as adults receiving instruction off campus, at home and at work. In such situations, even when the area is relatively small, and low power transmission is feasible, the use of standard broadcast channels for broad coverage appears to be more feasible than low power in the 2000 megacycle band because of the potential interference factors involved.

(5) It is also believed that if the auxiliary educational television service is established in the 2000 megacycle band that eligibility for ~~license~~<sup>license</sup> should extend to all educational institutions or organizations, including community television stations.

(6) In brief, the NAEB supports the proposal for an auxiliary educational television service in the 1990 - 2110 megacycle band with the understanding that this special service will serve an additional need over and beyond the established need for regular broadcast channels, as indicated in its recent national studies now on file with the FCC.

It is suggested that member ~~institutions~~<sup>STATIONS</sup> file supporting comments along these lines and emphasize, along with the need for the new service, the continuing need of education to have multiple channel service available that will reach into off-campus, out-of-school home receivers.

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