



# Virginia Association of Broadcasters Legal Review



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June 22, 2020

## Legal Memorandum

### 6 GHz Spectrum Update: Broadcasters Should Review Accuracy of 6 GHz Fixed Links to Help Prevent Harmful Interference

We write today with an update regarding the FCC’s 6 GHz proceeding—and with a reminder that broadcasters may wish to take certain action in order to help prevent harmful interference.

As you may recall, the FCC recently adopted a [Report and Order and Further Notice of Proposed Rulemaking](#) (the “Order”) that expands unlicensed broadband operations in the 6 GHz spectrum band (i.e., 5.925 GHz–7.125 GHz). The Order was a setback for broadcasters, who already have deployed—and rely on—significant electronic newsgathering operations in the 6 GHz band and who had warned the Commission that permitting expanded unlicensed broadband operations in the band could cause harmful interference to those electronic newsgathering operations. For years, broadcasters have used the 6 GHz band for essential broadcast auxiliary services, including video relays and the operation of certain wireless microphones.

The Order’s new rules are set to take effect on July 27, 2020. Accordingly, and to help avoid harmful interference on and after that date, it is important for broadcasters to review the accuracy of the information regarding their fixed 6 GHz links, as such information is listed in the Commission’s Universal Licensing System (“ULS”), as soon as possible.

*Why Should Broadcasters Verify This Information In ULS?* The Order’s new rules do provide limited protections to broadcasters by requiring many new, unlicensed users of the 6 GHz band to consult an automated frequency coordination (“AFC”) system prior to deploying operations. The AFC system will use broadcasters’ existing operations to establish “exclusion zones” where new unlicensed devices cannot operate.

However, the AFC system will only be as effective as the licensee data with which it is populated. That data will come directly from ULS and will include transmitter and receiver locations, frequencies, bandwidths, polarizations, transmitter effective isotropic radiated power (“EIRP”), antenna height, and the make and model of the antenna and equipment used.

It is therefore critical for broadcasters to review ULS as soon as possible to ensure that the foregoing information regarding their fixed 6 GHz links is accurate. To the extent actual operations differ from the ULS records, broadcasters may wish to seek to modify those records (quickly) to ensure protection from harmful interference from any other spectrum users. (For example, if frequency coordination is required to remedy incorrect ULS information, then it will likely take at least two weeks to go through the necessary coordination processes.)

Additionally, for broadcasters who currently or in the future plan to operate temporary fixed links, please be aware that although the capability to register temporary fixed links does not currently exist in ULS, the FCC is developing that functionality and will announce its availability in a forthcoming Public Notice. We will be monitoring Commission activity and will let you know once the capability to register temporary fixed links is added to ULS.

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*Tim Nelson, Editor*

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