



Marlene Dortch, Secretary
FCC
445 12th St, SW
Washington, DC 20554

May 8, 2019

RE: ET Docket No. 14-165; Petition for rulemaking in the Matter of Amendment of Part 15 of the Commission's Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap, and Channel 37

Dear Ms. Dortch,

Declaration Networks Group, Inc (DNG) joins with the Wireless Internet Service Provider (WISP) industry in support of the proposed TV White Space rulemaking submitted last week by Microsoft to the FCC. The proposal is focused on provisions that will increase industry's ability to deliver high quality broadband services to unserved and underserved regions of the country, and includes:

- Higher power limits in the second-adjacent channel in less congested areas;
- Operation of devices above 40 milliwatts in the first-adjacent channel where interference concerns are minimal; and,
- Operation at average terrain of up to 500 meters, subject to special FCC coordination rules.

DNG has successfully been delivering broadband services for years to underserved regions with fixed wireless technologies including TV White Spaces. The proposed rulemaking on these and other operational issues will efficiently increase the range and capacity of rural networks and further enhance the ability to close the digital divide.

Microsoft's the petition reflects significant operational improvements and is an important step in the evolution of the existing TV White Space policy that will further support DNG's and the industry commitment to deploy broadband services to all Americans.

DNG is in full support of the Microsoft request to launch a Further Notice of Proposed Rulemaking to make a set of improvements to the White Space device ("WSD") rules, and it is my hope that the FCC will give the proposal full consideration and approval.

Sincerely,

Robert Nichols

Bob Nichols
CEO
Declaration Networks Group, Inc