



June 11, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Ex Parte Communication, ET Docket No. 16-56, ET Docket No. 14-165, MB Docket No. 15-146, RM-11745, GN Docket No. 12-268

Dear Ms. Dortch:

On June 7, 2018, Robert Weller and the undersigned, both of the National Association of Broadcasters (NAB) met with Julius Knapp, Matthew Hussey, Paul Murray, Kevin Holmes, Jamison Prime, Karen Rackley, and Rashmi Doshi of the Office of Engineering and Technology. During this meeting, NAB discussed recent ex parte filings by Microsoft regarding a proposed alternative to the Commission's push notification requirement, which is designed to prevent interference to protected services, including licensed wireless microphones.¹ Under this alternative proposal, only those TV White Spaces (TVWS) devices operating on one or two designated "fast-polling" channels would be required to query the database every 20 minutes to find out if these channels were still available.

This proposal assumes that TVWS devices will seldom operate on fast-polling channels because checking the database every 20 minutes would be disastrous for battery life of TVWS devices - particularly portable devices. In other words, the proposal is to establish fast polling channels that TVWS devices will then seek to avoid using. As an initial matter, it is ironic that Microsoft, which is currently campaigning for an additional channel to be reserved for white spaces use, is now embracing a proposal to rarely use available channels. Does Microsoft need additional spectrum for white spaces, or is there so much that Microsoft can afford not to use some channels?

¹ Letter from Paul Margie to Marlene H. Dortch ET Docket No. 16-56, ET Docket No. 14-165, MB Docket No. 15-146, RM-11745, GN Docket No. 12-268 (May 21, 2018); Letter from Paul Margie to Marlene H. Dortch ET Docket No. 16-56, ET Docket No. 14-165, MB Docket No. 15-146, RM-11745, GN Docket No. 12-268 (April 6, 2018).

Moreover, NAB questions the utility of a TVWS device that will be burdened by a simple database inquiry once every 20 minutes. The entire point of a TVWS device is to communicate – whether with other TVWS devices, with the Internet or with the TVWS database. The amount of data that must be transmitted to verify that a channel is still available is very small – likely a kilobyte or less. Even if a 10 kB message were required, if a device transmits at 5 MB per second, the total transmission time would be 0.002 seconds – or less than a quarter of a second per day total. According to Microsoft, then, TVWS devices will be unduly burdened by transmitting for a quarter of a second per day.

If this is true, it is difficult to understand what the use case for a portable TVWS device would be. Microsoft has repeatedly promised that TVWS technology offers the key to solving the rural broadband challenge, yet it appears that Microsoft's solution to the rural broadband problem is for rural users to not actually use the Internet.

If Microsoft believes that fast polling is an acceptable alternative to the Commission's push notification requirement, fast polling should be required on all channels. There is no credible reason to confine fast polling to one or two channels.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Patrick McFadden", with a stylized, flowing script.

Patrick McFadden
Associate General Counsel,
National Association of Broadcasters

cc: Julius Knapp
Matthew Hussey
Paul Murray
Kevin Holmes
Jamison Prime
Karen Rackley
Rashmi Doshi