

August 15, 2017

Ex Parte

Ms. Marlene H. Dortch

Secretary

Federal Communications Commission

445 12th Street SW Washington, DC 20554

Re: MB Docket No. 15-146; GN Docket No. 12-268

Dear Ms. Dortch:

On August 14, 2017, Kalpak Gude, President of the Dynamic Spectrum Alliance (DSA) met with the attached list of FCC representatives from the Media Bureau, Office of Engineering Technology, Wireless Telecommunications Bureau, regarding the above-listed proceeding.

Mr. Gude discussed the TV White Space (TVWS) issue, and particularly the Vacant Channel proceeding. Mr. Gude discussed the rate of TVWS deployment, both in the U.S. and around the globe, the interest in TVWS in a number of countries on virtually all continents, and the impact on low power television (LPTV) of maintaining a vacant channel for TVWS.

Mr. Gude also discussed the critical need for having at least three channels per market for TVWS, in order to ensure availability everywhere and incentivize investment, both by chip manufacturers and service providers, in TVWS technology. In particular, Mr. Gude highlighted that although identifying a vacant channel was only possibly an issue in a few urban markets, the impact would be on the entire TVWS ecosystem. A balancing test merely between a single LPTV station in one market versus TVWS availability in that market would be a mistake as the lack of TVWS channels everywhere would negatively impact the availability of TVWS everywhere.

Finally, Mr. Gude raised the issue of the FCC ensuring, or at least encouraging, all rural LPTV or translators to be placed together in one portion of the band so as to enable the most efficient use of the remaining spectrum for TVWS services as aggregation of channels can be done effectively in adjacent spectrum and that this will enable much higher throughput to be achieved, providing significant benefits to rural residents as their Internet broadband speeds could then be similar to their urban counterparts; obviously a strong goal for the Commission.

Respectfully submitted,



Kalpak Gude

President

Dynamic Spectrum Alliance

List of FCC Participants:

Michelle Carey (MB)

Jean Kiddoo (WTB)

Kevin Harding (MB)

Shaun Maher (MB)

Erin Griffith (WTB)

Charlie Meisch (WTB)

Joyce Bernstein (MB)

Barbara Kreisman (MB)

Karla Hoffman (WTB))

Tony Coudert (WTB)

Hugh Van Tuyl (OET)

Mark Colombo (OET)

Paul Murray (OET)

Brian Smith (WTB)

Rudy K. Sultown (WTB)

Geraldine Matise (OET)

Sasha Javid (WTB)