



Nominet UK  
Oxford Science Park  
Oxford, OX4 4DQ  
United Kingdom  
Tel: +44 (0)1865 332 233  
Web: [www.nominet.uk](http://www.nominet.uk)

November 16, 2017

**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: Database Administrator Proposal  
ET Docket No. 04-186

Dear Ms. Dortch:

Attached please find the application of Nominet UK ("Nominet") to conditionally designate Nominet as a TV white spaces ("TVWS") database administrator pursuant to Section 15.715 of the rules of the Federal Communications Commission.<sup>1</sup>

Nominet greatly appreciates the Commission, and the Office of Engineering and Technology ("OET"), for its substantial work over the years to enable white spaces operations through geo-location databases. Nominet has been involved in white spaces for several years. We believe it has the potential not only to increase access to the internet in the UK, the U.S., and internationally, but also to enable emerging Internet of Things technologies.

Our principal interest is commercial operation of geo-location spectrum databases leveraging our extensive experience in running authoritative national internet infrastructure services, and in providing spectrum management tools to regulators, network operators, and radio manufacturers.

As the Commission might be aware, Nominet operates a commercial TVWS database in the UK, and played a central role in Europe's first commercial TVWS broadband rollout, which took place on the remote Isle of Arran. Nominet's TVWS database was the first to complete Ofcom's qualification process, and has since been used for academic research, for exhibits, and in live trial projects. Nominet continues to engage extensively with Ofcom to inform the continued development of their

---

<sup>1</sup> 47 C.F.R. § 15.715.

TVWS regulatory framework.

Nominet is now taking its considerable TVWS expertise outside of the UK to bring affordable internet access to remote and rural communities internationally, where the company is working with local and international partners to close the digital divide and enable the Internet of Things through innovative and future-proof technologies and policies.

Nominet is a member of the Dynamic Spectrum Alliance (“DSA”) and an active member of the DSA Regulatory Affairs Committee. Nominet has recently completed the first implementation of the DSA’s Model Rules for TVWS as part of a **Global TVWS Platform**. This implementation can be readily customized for different regulatory rulesets, utilizes worldwide datasets, and is already deployed as commercial software. Nominet R&D are leading efforts within the DSA to revise these rules as a result of the detailed work we have done, leveraging our considerable expertise on TVWS interference algorithms and regulations. We additionally have developed sophisticated mapping, planning, and wide-scale spectrum investigation tools. Nominet would like to apply to become a database manager in the U.S. to help accelerate the white spaces market and make it more affordable.

As OET has previously explained, it established a filing deadline in this proceeding “to allow orderly processing of the initial prospective database administrators,” but “this deadline was not intended to preclude other parties from requesting designation as a database administrator at a later date.”<sup>2</sup> Rather, the TVWS rules “were designed with the expectation that there could be changes in database administrators over time... .”<sup>3</sup> Nominet therefore requests that OET accept the attached demonstration of Nominet’s fitness as a database administrator (designated as Attachment A) and that it conditionally designate Nominet as such an administrator after providing interested parties with an opportunity to comment on this attachment. If you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Adam Leach

Mr. Adam Leach  
Director of Research & Development

Attach.

cc: Hugh L. Van Tuyl, Office of Engineering and Technology (via email)  
Best Copy & Printing, Inc. (via email)

---

<sup>2</sup> *Unlicensed Operation in the TV Broadcast Bands and Additional Spectrum for Unlicensed Devices Below 900 MHz and in the 3 GHz Band*, Order, 26 FCC Rcd. 10,599, ¶ 10 (2011).

<sup>3</sup> *Id.*