

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
National Association of Broadcasters Petition)	RM No. 11745
to Amend Sections 47 C.F.R. 15.711(b) and)	
47 C.F.R. 15.717)	
)	
Regarding Changes to Certain Rules for)	
Unlicensed Operations in the Television)	
Bands, Repurposed 600 MHz Band, 600 MHz)	
Guard Bands and the Duplex Gap and)	
Channel 37)	

To: Federal Communications Commission
(Filed electronically through ECFS)

COMMENTS OF CP COMMUNICATIONS, LLC

1. CP Communications, LLC (“CP Communications”), submits these Comments in response to the above-captioned Emergency Motion for Suspension of Operations and Petition for Rulemaking filed by the National Association of Broadcasters (“NAB”).¹ In the proceedings related to the transition of broadcast television services and other operations out of the 600 MHz band, CP Communications, many other commenters and the Commission itself, has recognized the importance of wireless microphones in providing established and valuable service to the public and the need for rules providing for clean spectrum for use for wireless microphone operations.

¹ See Request to Amend Sections 47 C.F.R. 15.711(b) and 15.717 Regarding Changes to Certain Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and the Duplex Gap and Channel 37 filed by National Association of Broadcasters, RM No. 11745, *Emergency Motion for Suspension of Operations and Petition for Rulemaking*, Public Notice Report No. 3016, April 1, 2015 (“*Petition*”). The Commission placed the Petition on Public Notice, Report No. 3016, dated April 1, 2015 and so these Comments are timely filed.

The basis of many of the proposals for sharing of spectrum with wireless microphones and white space devices is the use of databases to ensure the avoidance of harmful interference between the services. Accurate information in the database is thus a paramount component of the success of the sharing proposals and so the accuracy of the database is of paramount importance.

2. CP Communications is a leading source for the rental of wireless production equipment -- including wireless microphones, wireless in-ear monitors, wireless intercom and wireless cueing -- to the broadcast, theatrical, live event, film, corporate, entertainment and other industries. CP Communications also sets up, manages, and supervises the operation of wireless equipment for its customers. CP Communications owns and operates wireless microphones in the 500 and 600 MHz bands and holds licenses for wireless microphones under Part 74 of the FCC's Rules. The Company's business is highly specialized, requiring hardware and skills that lead most high-level professional users to contract with outside vendors. Only a handful of companies offer these services, but their services are critical to the activities of their customers.

3. CP Communications agrees with NAB that the operation of the TVWS database and TVBD hardware should be suspended until the problems are resolved. Database errors can result many adverse impacts, for example, a white spaces device could turn on and interrupt a performance using wireless microphones at a registered venue. Given the significant number of errors, erroneous and apparently false information within the database, and the apparent lack of accurate daily synchronization between databases, there's sufficient reason to cease database operations and the TVBD/WSD registrations/operations in order to correct the database functionality and operation, especially while there are relatively very few legitimate entries that will result in the least amount of inconvenience. Additionally, no further databases should be

implemented until this first database functions correctly and accurately and a methodology for ensuring that any such databases will also function correctly and accurately going forward.

4. A major component of the proposals in the proceedings related to the transition of broadcast television services and other operations out of the 600 MHz band is the sharing of spectrum based on the ability of databases to ensure interference free sharing. Without accurate information in any such databases, this goal is threatened. Accordingly, CP Communications supports NAB's Petition to correct the database inaccuracies and to promote efficient and accurate information submissions to the databases.

Respectfully submitted,



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