



June 25, 2015

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

Re: Notice of Ex Parte Communication, RM-11745 and ET Docket No. 14-165

Dear Ms. Dortch:

On June 23 and June 24, 2015, Bruce Franca, Scott Goodwin, and the undersigned, all of the National Association of Broadcasters (NAB), had separate meetings with Matthew Berry and Brendan Carr of Commissioner Pai's office, Valery Galasso of Commissioner Rosenworcel's office, and Robin Colwell and Erin McGrath of Commissioner O'Rielly's office. We discussed the attached presentation and NAB's ongoing concern that the existing framework for the provision of unlicensed device operation in the TV "white spaces" (TVWS) is flawed and needs immediate correction to ensure interference-free operation.

The TVWS database has never been subject to closer scrutiny than it is now. Since the filing of NAB's Petition for Rulemaking regarding database problems in March, and the attendant press attention, database administrators have taken some steps to clean up obvious errors and flaws. Despite this effort, and despite the fact that the spotlight has never shone more brightly on the database, the database remains fundamentally flawed and incapable of serving its intended function in its current form.

Our updated examination of the TVWS database reveals that the database is, once again, riddled with inaccuracies despite the fact that the FCC has made aggressive efforts to clean up the errors. This confirms that the problem of inaccurate information in the database is one that will not stop – and will likely accelerate – unless and until the Commission changes its rules to ensure location data is built into the device and input with limited human involvement.

The Commission cannot reasonably move forward with liberalizing the TVWS rules without addressing the flaws in the database regime. Fortunately, NAB has proposed concrete, simple and practical solutions to address these flaws.

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Respectfully Submitted

A handwritten signature in black ink, appearing to read "Patrick McFadden", with a long horizontal flourish extending to the right.

Patrick McFadden
Vice President Spectrum Policy,
Legal and Regulatory Affairs
National Association of Broadcasters

Enclosure

cc: Matthew Berry
Brendan Carr
Valery Galasso
Robin Colwell
Erin McGrath