



June 30, 2015

Marlene H. Dortch, Esq.
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 Tuesday, June 26, 2015, Bruce Franca and the undersigned of the National Association of Broadcasters (NAB), met with Julius Knapp, Alan Stillwell, Martin Doczkat, Geraldine Matisse, Hugh Van Tuyl, and Ira Keltz of the Office of Engineering and Technology. We discussed the attached presentation and concerns with certain of the FCC's proposals for modifying the existing TV White Spaces (TVWS) rules.

NAB discussed its ongoing concern that the existing framework for the TVWS operation is flawed and needs immediate correction to ensure interference-free operation. Our updated examination of the TVWS database reveals that the database contains new inaccuracies, even following the FCC's aggressive efforts to clean up the errors. This only serves to underscore the need to make systematic changes to the TVWS rules to ensure that accurate data, including in particular accurate location data, is entered into the database.

NAB urged the Commission not to eliminate the two reserved channels for wireless microphones when the proposed rules for TVWS devices become effective. At a minimum, these two reserved channels should be preserved until alternative spectrum for wireless microphones, whether in the duplex gap or elsewhere, is identified and available.

We also discussed our concern with the lack of technical justification for the proposal to allow fixed devices to operate adjacent to occupied television channels at reduced power. While the power level proposed is the same for personal, portable devices, fixed devices have very different technical characteristics that create a significantly higher potential for harmful interference. Indeed, fixed devices could produce interfering signals 40 times stronger than personal, portable devices. Similarly, the proposal to allow TVWS operation at 4 watts with only 3 MHz of separation from active television stations lacks technical support. The FCC's own testing and studies demonstrate the potential for interference posed by such operations.

Finally, the Commission's proposal to allow higher power in rural areas should be adjusted. While NAB has no objection to higher power operation in rural areas, these areas should be

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truly rural to avoid the potential for harmful interference. The Commission's proposed definition of rural would encompass, for example, the city of Cleveland – hardly a rural area. Higher powered operations must be confined to truly rural areas, delineated by separation from television operation on proximate channels in adjacent markets.

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

Enclosure

cc: Julius Knapp
Alan Stillwell
Martin Doczkat
Geraldine Matise
Hugh Van Tuyl
Ira Keltz