



July 2, 2015

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165, GN Docket No. 12-354, RM-11745, Notice of *Ex Parte* Communication

Dear Ms. Dortch:

On June 30, Bruce Franca, Patrick McFadden and the undersigned of the National Association of Broadcasters met with Julius Knapp and Ira Keltz of the Office of Engineering and Technology, and John Leibovitz and Paul Powell of the Wireless Telecommunications Bureau.

The errors and misinformation NAB has uncovered in the current operation of the TV White Spaces (TVWS) database have troubling implications for unlicensed operation in the 3.5 GHz band. The demonstrably flawed spectrum access regime for TVWS does not provide a reliable foundation for interference-free shared use in the 3.5 GHz band.

Simply put, experience has confirmed that professional installation is unreliable and inadequate. Further, professional installation is not appropriate for consumer devices that are likely to be deployed in the 3.5 GHz band, and mere tweaks to the rules regarding the definition of "professional installation" are unlikely to address the fundamental problems. Rather than expanding the use of such a flawed system into other bands, the Commission should fix the TVWS database rules.

Respectfully Submitted

A handwritten signature in black ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right.

Rick Kaplan
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cc: Julius Knapp
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John Leibovitz
Paul Powell