

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

In the Matter of)
)
Amendment to Commission Rules Concerning) RM-11750
Adjudication of Spectrum Interference Disputes)

To: Chief, Wireless Telecommunications Bureau
Chief, Public Safety and Homeland Security Bureau
Chief, Enforcement Bureau

**COMMENTS
OF THE
ENTERPRISE WIRELESS ALLIANCE**

The Enterprise Wireless Alliance (“EWA” or “Alliance”), in accordance with Section 1.405 of the Federal Communications Commission (“FCC” or “Commission”) rules, hereby submits its Comments on the May 8, 2015 Petition for Rulemaking (“Petition”) filed by Samuelson-Glushko Technology Law & Policy Clinic (“TLPC”). The Petition asks the FCC to “provide an alternative mechanism for private parties to resolve their [spectrum interference] disputes that is fact-based, transparent, and timely....”¹ Specifically, the TLPC recommends that the rules be modified to permit private parties to submit interference complaints against one another directly to the Office of the Administrative Law Judges (“ALJ Office”), an option that currently is available to, but rarely used by, the FCC for addressing such matters. The Petition also proposes that deadlines be added to this ALJ adjudication process and that the ALJ Office be given the resources needed to handle these additional responsibilities.

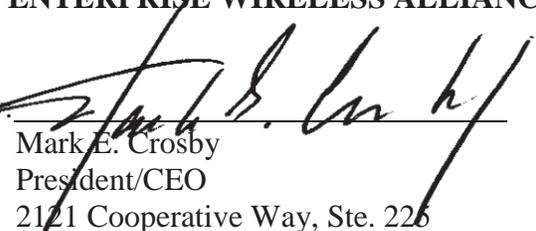
The Alliance agrees with the TLPC that the escalating use of spectrum in our increasingly untethered world is likely to increase instances of interference between users. EWA also agrees

¹ Petition at 1.

that the current process for resolving interference problems is not entirely predictable either in terms of timing or outcome. Particularly in light of the Commission's proposed reduction in Field Office staffing, it may be prudent to consider adding an interference resolution option such as that proposed in the Petition. While the Alliance is not certain that the ALJ Office is the optimal locus for that activity, which tends to be heavily dependent on evaluating competing technical claims rather than assessing legal rights, it nonetheless encourages the Commission to develop a record based on the proposal in the Petition, as well as alternatives that the FCC itself or other parties might consider even better suited to the task.

Respectfully submitted,

ENTERPRISE WIRELESS ALLIANCE

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