

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Amendment of Parts 15, 73 and 74 of the Commission’s Rules to Provide for the Preservation of One Vacant Channel in the UHF Television Band For Use By White Space Devices And Wireless Microphones)	ET Docket No. 15-146
)	
Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions)	GN Docket No. 12-268
)	
)	

**IN SUPPORT OF A MOTION FOR EXTENSION OF TIME OF
THE NATIONAL ASSOCIATION OF BROADCASTERS**

Shure Incorporated (“Shure”), by its undersigned counsel, hereby makes this submission in support of the National Association of Broadcasters (“NAB”) request for a limited extension of the time for filing comments in the above-captioned proceeding regarding the Federal Communications Commission’s (“Commission’s”) proposal to preserve one television channel for use by wireless microphones and TV White Space Devices (“TVWSD”) following the 600 MHz Broadcast Spectrum Incentive Auction (“Auction”).¹ Comments in this proceeding are presently due not later than August 3, 2015, and reply comments are due not later than August 24, 2015. Pursuant to Section 1.46 of the Commission’s Rules, Shure supports NAB’s request for a 21-day extension of these deadlines, which would require comments to be due not later than August 24, 2015, and reply comments to be due not later than September 23, 2015.²

¹ *Amendment of Parts 15, 73 and 74 of the Commission’s Rules to Provide for the Preservation of One Vacant Channel in the UHF Television Band For Use By White Space Devices and Wireless Microphones*, Notice of Proposed Rulemaking, MB Docket No. 15-146, GN Docket No. 12-268, FCC 15-68 (June 16, 2015) (“*Vacant Channel Proceeding*”).

² 47 CFR § 1.46(b).

Shure concurs that a limited extension of time would serve the public interest given that new issues have only recently emerged with respect to the question of whether and how to reserve a television channel in Ultra High Frequency (“UHF”) television band spectrum for possible use by wireless microphones and TVWSDs subsequent to the Auction. The delay in the release of the Commission’s Procedures Public Notice³ until August 6, 2015, hinders Shure and other stakeholders from fully analyzing the extent to which the availability of duplex gap spectrum might be affected in certain markets. Given that the availability (or lack thereof) of duplex gap spectrum, together with other potential changes to the Commission’s Part 15 “white spaces rules,”⁴ may shape Shure and other interested third party positions on the vacant channel, at a minimum, the Commission should allow commenters adequate time to digest and reflect on the impact and range of possible solutions that are relevant once the Commission’s conclusions in the Procedures Public Notice and Part 15 Modification Proceeding are made public. Accordingly, Shure supports NAB’s proposal to extend the deadline for comments in this proceeding concerning the vacant channel for a 21-day period (which is commensurate with the delay in the release of the Procedures Public Notice.)⁵

Shure understands the Commission’s need to expeditiously resolve outstanding issues concerning the Auction. In this particular instance, however, a 21-day delay in the deadline for comments regarding the availability of a vacant channel for wireless microphones and TVWSD will not inject meaningful delay into the Commission’s schedule. Specifically, because the

³ See Commission Notice deleting the Procedures Public Notice from July 16, 2015 Open Meeting, available at: http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0715/DOC-334389A1.pdf (last visited July 28, 2015).

⁴ See *Amendment of Part 15 of the Commission’s Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap, and Channel 37, and Amendment of Part 74 of the Commission’s Rules for Low Power Auxiliary Stations in the Repurposed 600 MHz Band and 600 MHz Duplex Gap*, ET Docket No. 14-165, Notice of Proposed Rulemaking (Sep. 30, 2014) (“*Part 15 Modification Proceeding*”).

⁵ The Procedures Public Notice was initially scheduled for the Commission’s July 16, 2015 Open Meeting. It is now tentatively scheduled for the August 6, 2015 Open Meeting.

preservation of a vacant UHF TV band channel for wireless microphones and TVWSDs is a post-auction issue not involving spectrum repurposed for the Auction, the Commission can continue to work in parallel without delay on other outstanding issues that require pre-auction resolution.

Respectfully Submitted,

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