

July 30, 2015

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: *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); *Promoting Spectrum Access for Wireless Microphone Operations* (GN Docket No. 14-166); *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions* (GN Docket No. 12-268)

Dear Ms. Dortch,

On Thursday, July 30, 2015, Krista Witanowski, Brian Josef, and Kara Romagnino of CTIA – The Wireless Association® (“CTIA”) had a telephone conversation with Julius Knapp, Chief, and Ira Keltz, Deputy Chief, of the Office of Engineering and Technology to discuss issues in the above-captioned proceedings. Separately, Krista Witanowski and Brian Josef had a telephone conversation with Johanna Thomas, Legal Advisor to Commissioner Jessica Rosenworcel.

During the conversations, CTIA explained that the incentive auction represents an important opportunity to bid for access to much-needed spectrum for mobile broadband use and noted the wireless industry's willingness to invest in spectrum rights so long as those spectrum rights are afforded the interference protections mandated by Congress in the 2012 Spectrum Act. While CTIA has consistently supported rules that both maximize repurposing spectrum for licensed exclusive use in the 600 MHz band and provide for non-interfering unlicensed operations, CTIA stressed the importance that certainty has for potential bidders in the forward auction and reiterated that the current proposals concerning interference protections for licensed 600 MHz operations threaten to undermine the success of the incentive auction.

In particular, CTIA highlighted the real-world testing results of V-COMM, which demonstrate that the Commission's proposed technical rules for unlicensed operations in the 600 MHz guard bands and duplex gap would result in harmful interference to licensed services in violation of the Spectrum Act. To provide the necessary and statutorily-defined rights for 600 MHz licensees, CTIA reiterated the need for the Commission to increase out-of-band emission limits and frequency separation as outlined in V-COMM's report. Finally, CTIA expressed its commitment to work with the Commission to implement technical rules for unlicensed 600 MHz operations in a manner that complies with the Spectrum Act, protects licensed services from harmful interference, and creates a framework that will facilitate a successful auction.

While CTIA continues to believe that the best course of action for the 600 MHz band is to adopt the technical rules for unlicensed devices and wireless microphone operations in the duplex gap and guard bands proposed by V-COMM and endorsed by CTIA, we noted that it is essential for the Commission to provide a means for addressing harmful interference should it occur. Therefore, consistent with the letter CTIA filed with the Commission on July 23, 2015,<sup>1</sup> CTIA urged the Commission to ensure that its rules include a requirement that no actual harmful interference be caused to licensed 600 MHz operations by unlicensed white space devices or wireless microphones. CTIA further urged the Commission to adopt a “Stop Buzzer” mechanism for ensuring that secondary service devices that cause harmful interference cease operations. The Commission has historically encouraged parties to first try to resolve interference issues among themselves before coming to the Commission for action, and such a mechanism for contacting interfering operations directly would facilitate this approach.

Finally, CTIA urged the Commission to refrain from taking a bifurcated approach to the commencement of operations proposals and instead defer its decision regarding how database administrators store information on the locations where 600 MHz band licensees commence operations. Deciding this issue at the same time that the Commission adopts the definition of “commence operations” would not lead to any delays in the incentive auction, as this process would not be invoked until after the auction concludes and broadcast stations have repacked. Further, the FCC must still decide the related definitional issues for commencement of operations, which logically should include the methodology for notifying white space database administrators of 600 MHz commencement of operations.

Pursuant to Section 1.1206 of the Commission’s rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS. Please direct any questions to the undersigned.

Sincerely,

/s/ Krista L. Witanowski

Krista L. Witanowski  
Assistant Vice President, Regulatory Affairs  
CTIA – The Wireless Association®

cc: Johanna Thomas  
Julius Knapp  
Ira Keltz

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<sup>1</sup> See Letter from Krista L. Witanowski, AVP, CTIA, to Marlene H. Dortch, Secretary, FCC, ET Docket No. 14-165, GN Docket Nos. 12-268, 14-166 (filed July 23, 2015).