



July 30, 2015

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

Re: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268; Policies Regarding Mobile Spectrum Holdings, WT Docket No. 12-269; Comment Sought on Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auctions 1001 and 1002, AU Docket No. 14-252; 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, ET Docket No. 14-165; Promoting Spectrum Access for Wireless Microphone Operations, GN Docket No. 14-166; Notice of *Ex Parte* Communication

Dear Ms. Dortch:

On July 29, 2015, the undersigned and Bruce Franca of the National Association of Broadcasters (NAB) met with Brendan Carr of Commissioner Pai's office. During this meeting, NAB discussed the Commission's proposals to make additional spectrum available for wireless microphones and to modify the current rules for unlicensed TV White Space operations.

NAB discussed the joint proposal we submitted with several TV White Space device manufacturers, which would amend certain of the Commission's rules to improve the accuracy of the White Spaces database and reduce the potential for interference.¹ We appreciate the efforts of the Office of Engineering and Technology, which were invaluable in reaching this compromise, and we look forward to a prompt rulemaking proceeding to adopt needed changes.

We also discussed our ongoing concern that many of the Commission's proposals to relax the rules for unlicensed operations in the television band lack sound engineering support,

¹ Letter from Adaptrum, Inc., Carlson Wireless Technologies, Inc., Koos Technical Services, Inc., MELD Technology, Inc. and NAB to Julius P. Knapp, ET Docket No. 14-165; RM-11745 (July 17, 2015).

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and may increase the potential for harmful interference.² For example, the proposal to allow fixed devices to operate on channels adjacent to occupied television channels does not take into account the different interference characteristics of portable and fixed devices that make fixed devices more likely to cause interference. The proposal to allow fixed devices to operate on two contiguous vacant channels rather than three similarly lacks support.

Finally, we emphasized that the Commission's proposal to impair the duplex gap in some markets would eliminate the remaining reserved spectrum available to newsgathering operations for wireless microphones in those markets. Preserving the duplex gap for wireless microphones and unlicensed services remains the best solution to ensure that news crews have access to spectrum needed to cover breaking news and emergencies. Identifying alternative bands for shared use by wireless microphones, while helpful, does not address the urgent need for some reserved spectrum for licensed wireless microphones in all 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
National Association of Broadcasters

cc: Brendan Carr

² See Letter from Patrick McFadden to Marlene H. Dortch, ET Docket No. 14-165, RM-11745 (June 30, 2015).