

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

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
)	
Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auction 1001 And 1002)	AU Docket No. 14-252
)	
)	
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 Spaces Devices and Wireless Microphones)	MB Docket No. 15-146
)	

To: Federal Communications Commission
(Filed electronically through ECFS)

COMMENTS OF CP COMMUNICATIONS, LLC

1. CP Communications, LLC ("CP Communications"), submits these Comments in support of the above-captioned Petition for Reconsideration filed by the National Association of Broadcasters ("NAB").¹ In the proceedings related to the transition of broadcast television

¹ See Petition for Reconsideration of the National Association of Broadcasters filed September 10, 2015, seeking reconsideration of certain aspects of the Commission's Public Notice. *Broadcast Incentive Auction Scheduled to Begin on March 29, 2016; Procedures for Competitive Bidding in Auction 1000, Including Initial Clearing Target Determination, Qualifying to Bid, and Bidding in Auctions 1001 (Reverse) and 1002 (Forward)*, Public Notice, GN Docket No. 12-268, WT Docket No. 12-269, AU Docket No. 14-252, MB Docket No. 15-146, FCC 15-78 (August 11, 2015) (Procedures PN).

services and other operations out of the 600 MHz band, CP Communications, many other commenters, and the Commission itself, have acknowledged the importance of wireless microphones in providing established and valuable service to the public and the need for rules providing for clean spectrum for use for wireless microphone operations. CP Communications has a very strong stake in how the Commission deals with wireless microphones, because it is a contractor to many of NAB's members and is the entity that has to solve the problem of finding enough frequencies for the microphone configurations that its customers, both broadcasters and otherwise, demand. To ensure CP Communications and other similar contractors can meet the needs of the myriad of users that they serve -- needs that are universally acknowledged -- the Commission must recognize the reality of the issues raised by NAB and must address them in a meaningful way that produces results, not just the hope that things will somehow work out.

2. CP Communications is a leading source for the rental of wireless production equipment -- including wireless microphones, wireless in-ear monitors, wireless intercom and wireless cueing -- to the broadcast, theatrical, live event, film, corporate, entertainment and other industries. CP Communications also sets up, manages, and supervises the operation of wireless equipment for its customers. CP Communications owns and operates wireless microphones in the 500 and 600 MHz bands and holds licenses for wireless microphones under Part 74 of the FCC's Rules. The Company's business is highly specialized, requiring hardware and skills that lead most high-level professional users to contract with outside vendors. Only a handful of companies offer these services, but their services are critical to the activities of their customers. They are called upon to configure and operate the most complex systems -- those beyond the expertise of even broadcast customers -- and are on the "front lines" when it comes to finding and efficiently using spectrum.

3. CP Communications agrees with NAB that the relocation of stations to the duplex gap will eliminate the availability of the duplex gap for wireless microphones in key markets where spectrum is the most scarce and will leave those markets without adequate clear spectrum for wireless microphone services. The Commission is setting up a situation where serious problems are probable, not remote, if a television station blocks otherwise available spectrum in the duplex gap. Everyone acknowledges that spectrum is a finite resource. To put it another way, if the spectrum resource were a balloon with a fixed amount of air in it, we all know that if you squeezed that balloon in one place, it would pop out somewhere else; but in the case of wireless microphone operations, there is not enough room for the balloon to expand elsewhere when spectrum is squeezed out of it.

4. The decision to relocate TV stations in the duplex gap in the wireless band is inconsistent with, if not a complete reversal of, the Commission's previous position acknowledging the importance of available spectrum for wireless microphone use in the *Second Memorandum Opinion and Order* in the White Spaces Docket.² The Commission provided protection at that time by reserving two UHF TV channels for microphones. However, this protection was short-lived; the two-channel reservation has been removed. The duplex gap was a vital part of the relief the Commission provided for loss of the two-channel reservation; but now, the current proceedings seek to viscerate that relief and to limit further the spectrum available for the important uses of wireless microphones.

5. You cannot do something with nothing, or do it in an impossibly small space. You have to dance the rumba on a dance floor, not in a shower stall. Accordingly, CP

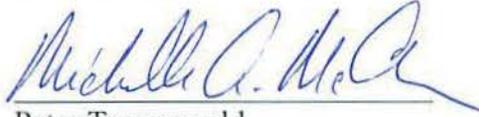
² See *Second Report and Order*, 23 FCC Rcd 18661 at 18674 (2010).

Communications supports NAB's Petition for Reconsideration of the decision to relocate TV broadcast stations in the duplex gap.

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Respectfully submitted,



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CERTIFICATE OF SERVICE

I, Sandi Kempton, a legal assistant for Fletcher, Heald & Hildreth, P.L.C., hereby certify that on this 21st day of September, 2015, I caused a copy of the foregoing "Comments" to be served via hand delivery and email, upon the following:

Rick Kaplan
Patrick McFadden
National Association of Broadcasters
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Sandi Kempton