

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Deere & Company Request for Limited Waiver) ET Docket No. 15-184
Of Part 15 Rules for Fixed Television)
Broadband Device)

To: Chief, Office of Engineering and Technology

**COMMENTS OF
THE WIRELESS INTERNET SERVICE PROVIDERS ASSOCIATION**

The Wireless Internet Service Providers Association (“WISPA”), in response to the Office of Engineering and Technology’s *Public Notice*¹ and pursuant to Sections 1.415 and 1.419 of the Commission’s Rules, hereby comments on the above-captioned request for waiver of certain Part 15 rules filed by Deere & Company (“Deere”).²

The Waiver Request seeks waiver of Sections 15.703(c), 15.711(b) and 15.711(e) to allow Deere to deploy 4 Watt EIRP fixed TV white space devices on mobile farm equipment. WISPA is discussing with Deere the extent to which 4 Watt mobile operations would be spectrally efficient so that WISPA can better understand Deere’s use case. WISPA is hopeful that these discussions will prove fruitful, and will keep the Commission informed of its ongoing discussions and any understandings that WISPA and Deere may reach.

In addition, in considering Deere’s Waiver Request, the Commission should remain mindful that other entities may in the future seek waiver to provide mobile operations at the fixed

¹ *Public Notice*, “Office of Engineering and Technology Declares Deere & Company Request for Waiver of TV White Space Device Rules to be a ‘Permit-But-Disclose’ Proceeding for *Ex Parte* Purposes and Requests Comment,” DA 15-947 (rel. Aug. 21, 2015).

² Letter from Mark Lewellen, Manager of Spectrum Advocacy, Deere & Company, and William M. Koos, Jr., President, Koos Technical Services, Inc., to Julius Knapp, Chief, Office of Engineering and Technology (filed July 13, 2015) (“Waiver Request”).

power level in TV white space spectrum. Waivers of Commission rules should be reserved for cases where “good cause” is shown under Commission rules and precedent,³ and not to create a *de facto* rule allowing higher power personal/portable operations.

Respectfully submitted,

**WIRELESS INTERNET SERVICE
PROVIDERS ASSOCIATION**

September 21, 2015

By: */s/ Alex Phillips, President*
/s/ Mark Radabaugh, FCC Committee Chair
/s/ Jack Unger, Technical Consultant

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³ See 47 C.F.R. § 1.3.