



North American
Broadcasters Association
P.O. Box 500, Station A
Toronto, ON M5W 1E6
Canada

Tel: +1 416-598-9877
Fax: +1 416-598-9774
Email: contact@nabanet.com
Web: www.nabanet.com

November 27, 2015

Full Members:

Bell Media
CBC/Radio-Canada
CBS Broadcasting Inc.
DIRECTV, Inc.
Disney | ABC Television Group
Fox Entertainment Group, Inc.
Grupo Televisa, S.A.
NBCUniversal
Time Warner Inc.
TV Azteca S.A. de C.V.
Univision Communications Inc.
Associate Members:
Corus Entertainment
Emmis Communications
National Association of Broadcasters (NAB)
NPR
Pearl TV
Public Broadcasting Service (PBS)
Sinclair Broadcast Group
Affiliate Members:
Ad-ID
Dolby Laboratories Inc.
Ericsson Television Inc.
Eutelsat America Corp.
Evertz Microsystems
Harmonic Inc.
HD Radio™ – a DTS Solution
HERE
Imagine Communications
Inmarsat
Intelsat
Level 3
Numeris
SES

Julius Knapp

Chief, FCC Office of Engineering and Technology
Washington, DC USA

Corinne Charette

Senior Assistant Deputy Minister, Spectrum, Information Technologies and
Telecommunications, Industry Canada
Ottawa, ON CANADA

Maestro Gabriel Contreras Saldívar

President, Presidente del Instituto Federal de Telecomunicaciones (IFT)
Mexico City, DF MEXICO

Dear Madame/Sirs:

Founded in 1972 and headquartered in Toronto, Canada, the North American Broadcasters Association (NABA) is a non-profit association of broadcasting organizations in Canada, the United States and Mexico committed to advancing the interests of broadcasters locally and internationally. The use of the broadcast TV bands for use by unlicensed devices is thus a topic of both interest and concern.

A white paper originated by members of NABA's Technical Committee, and recently approved by the NABA Board of Directors, is attached on this subject. The white paper notes some of the history and problems in the U.S. experience with developing a regulatory regime for unlicensed devices in the broadcast TV bands along with perspective from Canadian and Mexican broadcasters on the status of development of similar services in those countries.

As stated in the paper, broadcasters understand the need to use spectrum effectively and efficiently. Broadcasters have a long history of sharing with other services and do not oppose sharing with unlicensed services provided that adequate safeguards are in place. While the paper describes some of the problems encountered in the U.S. experience with sharing the TV broadcast band with unlicensed devices, the paper also describes the recent joint solution proposed by U.S. broadcasters and unlicensed device manufacturers to address and improve this sharing situation.

I trust that this contribution is helpful in the consideration of unlicensed devices utilizing broadcast TV bands.

Sincerely,

Michael McEwen
Director-General, NABA

CC: Marc G. Girouard (Industry Canada), Lynn Claudy (NAB),
John Lee (CBC/Radio-Canada), and Leonardo Ramos (Televisa)