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March 29th, 2016

To: Marlene H. Dortch, Secretary

FCC Mail Room

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

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Subject: Runcom comments to: Notice of Proposed Rulemaking ET Docket No. 16-56

Dear Secretary,

Runcom believes that the benefits of the proposed Rulemaking to "eliminate the professional installer option for fixed white space devices and require that each fixed white space device incorporate a geo-location capability to determine its location...." are much lower than its drawbacks as described below.

- 1- The additional Hardware and Software needed to comply with the new rules will further increase the equipment price, that is already high due to the high costs related to compliance with the existing FCC regulation (Radiated and conducted emission; Adjacent Channels emissions, Data Base connectivity, etc.) and will substantially reduce the chances of wide TVWS market adoption. The same reasoning of high costs applies to the new requirement for TVWS devices that cannot have a geo-location capability (such as indoor units) that will need to be connected to an external source for geo-location. The new components needed to be added to the TVWS devices (GPS chip , GPS Antennas , connector , antenna cable , power source, SW, PC board space; etc.) in order to meet the proposed rulemaking will rise the current cost of the TVWS fixed terminal by more than 10% (~\$30 per unit)
- 2- The incorporation of a geo location capability in the Fixed TVWS devices will not be able to provide an accurate location of the actual transmitting element which is the antenna(s) that is (are) typically connected by cables externally to the TVWS device due to their physical size in the TVWS band . The radiating antenna can be in many installations at a substantial distance from the Fixed TVWS devices (100 feet and more) .If we add to this distance the 100 meters distance that the FCC is considering allowing external geo-location device to be located away from the TVWS devise we will receive a substantial location uncertainty that is far larger than the location uncertainty that will be manually introduced by a professional installer.
- 3- The new requirement will not be implemented in TVWS devices already installed and manufactured (those devises will be grandfathered) and as a consequence, once those devices will be moved from their original locations, they will require professional installation and manual location updates.
- 4- The TVWS devices will not be able to provide an accurate altitude location of the TVWS radiating elements and as a result the FCC is proposing to allow "users" to either override a height setting or manually input height data. Therefor since manual input of data is allowed for height information the FCC shall allow manual input of latitude and longitude location as well.

Best Regards,



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