

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

In the Matter of)	
)	ET Docket No. 16-56
Amendment of Part 15 of the)	
Commission’s Rules for Unlicensed)	RM-11745
White Space Devices)	

COMMENTS OF SENNHEISER ELECTRONIC CORPORATION

Sennheiser Electronic Corporation¹ (“Sennheiser”) appreciates the Federal Communications Commission’s (“FCC” or “Commission”) efforts to improve the accuracy and integrity of the white space device (“WSD”) database system. Sennheiser hereby comments in order to highlight the potential effects of certain rule changes proposed in this proceeding on the operations of wireless microphones.²

The Commission proposes changes to the current rule that requires a fixed WSD “to contact the database at least once a day to verify that its operating channels continue to be available for its use.”³ Sennheiser has no comment on the specific proposals, but notes that they presume that the newly-adopted “push” white spaces channel availability system will remain in place. The establishment of the new “push” system has been challenged,⁴ and, should the Commission determine to revert back to the previous “pull” system, the rules proposed here will

¹ Sennheiser is part of Sennheiser Electronic GmbH & Co. KG, headquartered in Germany, which is a global leader in advanced microphone technology, RF-wireless and infrared sound transmission, headphone transducer technology, and active noise cancellation. Sennheiser Electronic Corporation is the main U.S. sales and marketing office, located in Old Lyme, Connecticut. Sennheiser also has a research center in San Francisco, California, and a manufacturing plant in Albuquerque, New Mexico that produces the majority of Sennheiser wireless microphones sold in North America, South America, Canada, and Asia.

² *Amendment of Part 15 of the Commission’s Rules for Unlicensed White Space Devices*, Notice of Proposed Rulemaking, ET Docket No. 16-56 (rel. Feb. 26, 2016) (“NPRM”).

³ NPRM at ¶ 22.

⁴ See Google, Inc. Petition for Reconsideration, WT Docket No. 14-165 (filed Dec. 23, 2015).

not provide for a sufficiently rapid response. Because the “push” system was put in place to ensure that white space devices clear a channel needed for licensed wireless microphone users that need immediate access to channels for late-breaking events, Sennheiser’s position remains: Whatever set of requirements the Commission adopts, the end result must be that the databases are able to clear channels quickly and reliably for licensed wireless microphone use.

Second, the Commission makes two proposals that have the cumulative effect of greatly reducing the accuracy of locating WSDs, yet the Commission does not provide for a correspondingly similar increase in the protection distance for wireless microphones. The Commission proposes to eliminate the geo-location requirement for WSDs operating indoors, and would instead allow these devices to use the closest outdoor location.⁵ Sennheiser’s concern is that, for WSDs operating in very large buildings or indoor complexes, the closest outdoor location could be perhaps a block away, which would greatly reduce the location accuracy for these WSDs. Coupled with the proposal to modify the default location accuracy requirement for WSDs from ± 50 meters to ± 100 meters, for which the Commission seeks comment,⁶ these two changes could result in a great decrease in the location accuracy of certain WSDs. Any reduction in the location accuracy of WSDs must be accompanied by an increase in the protection contour of the protected services, including licensed wireless microphones.

Respectfully submitted,

⁵ NPRM at ¶ 26.

⁶ NPRM at ¶ 30.



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