

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

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

**COMMENTS OF
SPECTRUM BRIDGE, INC.**

Executive Summary

Spectrum Bridge, Inc. ("Spectrum Bridge") strongly supports the FCC goal to provide access to spectrum through sharing. Based on the experience we have gained operating a TVWS database, assisting in the development and certifications of radios and having a better understanding of how users are wishing to deploy TVWS solutions we believe that sharing of this band is technically feasible and can be economically attractive to use. We generally agree with the proposed rules but have concerns that some aspects of the registration process are unwieldy, difficult to implement consistently and may create confusion or such a high barrier to acceptance that they render the process unworkable.

We respectfully request that the FCC permit the database providers and radio vendors be able to develop solutions that meet the accuracy requirements without specifying how this should be achieved.

We are happy to continue the dialog with the FCC, and other interested parties to try to address the issues and concerns in order to make the sharing of TVWS more reliable and simpler for everyone to manage.

Respectfully,

Peter Stanforth
CTO
Spectrum Bridge Inc.
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Registration Information Availability, finding the right balance.

Information about the current user of the band is necessary in order for the spectrum band to be shared. High power devices register to permit easier and more rapid resolution of potential interference situations. There has been much debate about the provision of the registration data, its accuracy and the type of information that should be collected. Thus the definition of registration data has evolved with experience and this NPRM makes additional proposals for the collection and validation of registration data. We propose that some of the steps create an undue burden on the database providers. It has always been one of the basic tenants of the TVWS rules that the database provider was not the enforcer. The FCC did not abdicate any of its responsibility to the database provider. This was one reason Spectrum Bridge felt comfortable certifying as a database provider. The roles of the FCC and the database provider were very clearly defined. Processes permit the FCC to evaluate use, determine if a device or device user is acting within the rules and, if not, require the database provider to 'block' service to the device or user. With these new rules we believe that these lines have been blurred and we are concerned both about precedent and the implication for our business. We are further concerned about ill defined technical aspects as are outlined below.

The rules propose that the database should validate the contact information. Without any real definition of what is acceptable validation. It is quite easy for the database to 'ping' an email address and get a response, thus validating that a real email address has been entered, but whether this email address is legitimate or will be used in completely unknown. There is no way to programmatically validate a phone number, or that the phone number really belongs to the registrant.

The rules propose that a registration should be 'pending' until such time as this validation is completed. This creates a new status for a registration and a device which means that there are significant changes required to the individual databases to add validation, potential changes to the PAWS protocol for a

new, as yet undefined status and changes may be required to the interoperability specification (between the database providers) to account for these new states. It is not clear how the database providers, collectively, are to manage this status and any inconsistencies that may arise.

We are concerned about the application of these rules. For instance, a responsible user will update the information (we have a new person who will be responsible for these devices). Yet their action will result in their devices becoming non operational until such time as this update is validated. This is counter intuitive and we believe will result in less compliance, whereas we are trying to encourage more compliance. Legally we worry about the impact of a seemingly arbitrary decision to stop serving a radio device because the database thinks the registration data is incomplete or inaccurate. This seems to be a burden much greater and more onerous than the FCC applies to its own licensing databases.

From a WSDBA perspective the costs of implementing and maintaining email and phone validation will be extensive, maybe prohibitive, and yet they provide very little value to the process.

Spectrum Bridge believes test records are important part of the validation and ongoing operations of the White Space Databases and the devices that are using the database. We believe that some further refinement of what a test record is, along with how and when it is appropriate to use one will improve the consistency of the data between database and the understanding of the publicly available data but we strongly urge the FCC to continue to allow test records to be used as a tool.