Cohen, Dippell and Everist, P.C.

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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

Comments
on Behalf of
COHEN, DIPPELL AND EVERIST, P.C.

The following comments are submitted on behalf of Cohen, Dippell and Everist, P.C. ("CDE") and is in response to the Notice of Proposed Rulemaking and Order ("NPRMO") adopted February 25, 2016 and released February 26, 2016. CDE and its predecessors have practiced before the Federal Communications Commission ("FCC") for over 75 years in broadcast and telecommunications matters. The firm or its predecessors have been located in Washington, DC since 1937 and performed professional consulting engineering services to the communication industry.

The undersigned is licensed as a Professional Engineer in the District of Columbia and has been in continuous employment with this firm or its predecessors for over fifty (50) years.

The FCC in the NPRMO has taken an important step in addressing some of the concerns of implementing shared spectrum by unlicensed white-space devices. The FCC's goal is to make

seamless the implementation by unlicensed white-space devices without taxing valuable FCC resources.

The collaboration by the National Association of Broadcasters ("NAB") and the four white-space device manufacturers[1] ("Manufacturers") is applauded.

In paragraph 15 of the NPRMO beginning with the 7th line, it states, "To date, we are not aware of any interference from operation of fixed white space test devices at a location different from the last location where the device is registered." That raises a difficult question whereby the white-space device used in the last test, the emission characteristics must be known as well as the other technical details. In addition, while every situation is different, other existing receivers must be identified so that when the test is performed, any interference issue can be properly identified and verified. Based on the downsizing of the field bureau and the apparent unsettled nature of the field office reorganization, complete reliance by the organization doing the test will not only be required, but necessary.

Support is given:

- where coordinates differ by more than ±50 meters from the last location, reregistration must be required for the white-space device. With reference to the vertical height accuracy, it is our opinion reliance should be made from the white-space device.
- to the FCC proposal to require a fixed white-space device verifying its coordinates daily when in operation.
- to the FCC proposal to receive confirming response concerning each device registration.

[1]Adaptrum Inc., Carlson Wireless Technologies, KTS Wireless and Meld Technology

This firm is still having some question regarding the registration of a LPTV/ translator into this database. This firm has made its questions known to FCC staff member and looks forward to a resolution of same.

This firm expresses its continued appreciation of the FCC's efforts to promote and assist in protection of existing receivers whether broadcast or consumer.

Respectfully Submitted,

COHEN, DIPPELL AND EVERIST, P.C.

Donald G. Everist
President

DATE: May 6, 2016