

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

And

**THE NATIONAL TELECOMMUNICATIONS AND
INFORMATION ADMINSTRTION**
Washington, D. C. 20230

In the Matter of)
)
Federal Communications Commission Seeks)
Public Comment on Creation of a Spectrum) ET Docket No. 06-89
Sharing Test-Bed)

REPLY COMMENTS OF ADAPT4, LLC

Adapt4 is pleased to submit these Reply Comments in response to in the above captioned matter.¹

Adapt4 reiterates its support in the efforts of the Commission and NTIA to “evaluate innovative methods for spectrum sharing among disparate users to enable a more intensive use of the finite radio spectrum”.² We also agree with Shure Incorporated (“Shure”) that “all new forms of unproven technology require a testing period prior to mainstream introduction ...”³ and that “ a Test-Bed could help validate new technologies and speed market introduction of technologies that prove to be ‘ripe’, while weeding out technologies that are not yet ‘ market ready’ ”.⁴

Adapt4 concurs with Shure and other’s that the Test-Bed will help the Commission and NTIA to valid spectrum-sharing technologies. The XG1 Cognitive Radio incorporates a non-interfering spectrum-sharing technology.

¹ *Public Notice*, Federal Communications Commission Seeks Comment on the Creation of a Spectrum Sharing Innovation Test-Bed 06-77, rel. June 8, 2006 (“*Public Notice*”)

² *Public Notice*, at p. 1.

³ See Comments of Shure Incorporated, filed in ET Docket No. 06-89 on July 10, 2006 at p 4.

⁴ See Comments of Shure Incorporated, filed in ET Docket No. 06-89 on July 10, 2006 at p 3.

Existing secondary use (spectrum-sharing on a non-interfering basis) under current Part 90 rules provides insufficient bandwidth for these “SMART”⁵ technologies to mainstream forward. Expansion of existing Commission rules is imperative to achieving the goal of improving the efficient use of the finite radio spectrum through spectrum-sharing on a non-interfering basis.

Respectfully submitted,

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⁵ See Comments of Shure Incorporated, filed in ET Docket No. 06-89 on July 10, 2006 at p 4.