

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

In the Matter of)
)
Creation of a Spectrum) ET Docket No. 06-89
Sharing Innovation)
Test-Bed)

**REPLY COMMENTS
OF
MARCUS SPECTRUM SOLUTIONS**

Marcus Spectrum Solutions (MSS), an independent consulting firm specializing in wireless technology and spectrum policy, is pleased to respond to this important proceeding. Dr. Michael Marcus, the Director of MSS, played a key role in many spectrum decisions at FCC including the 2002 deliberations of the Spectrum Policy Task Force. In these comments MSS is acting in the public interest, not on behalf of a specific client. The Commission is aware of the qualifications¹ of Dr. Marcus.

MSS strongly supports the comments of Shared Spectrum Company that urge that the testing of cognitive radio technology be a major goal of the test-bed.

More specifically, MSS urges that “interruptible spectrum”, as described on p. 42-44 of the Commission’s *Spectrum Policy Task Force Report* be made one specific goal of the test-bed. While FCC has shown interest in this concept at the staff level and has explored the concept in Docket 03-108, NTIA has *never* mentioned the topic in an official document and there is evidence that it discouraged FCC from even mentioning it in the context of Federal/non-Federal sharing.

¹ See http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-243463A1.pdf