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July 20, 2007

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
Washington, DC 20554

**Re: Report of *Ex Parte* Communication
ET Docket Nos. 04-186 and 02-380
Use of "White Spaces" in the TV Broadcast Spectrum**

Dear Ms. Dortch:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, this is to report that an *ex parte* oral presentation was made on July 19, 2007, concerning matters at issue in the above-referenced proceeding.

The presentation was made by representatives of the **Community Broadcasters Association** ("CBA").¹

The presentation was made in several meetings with the following members of the Commission's Staff:

Office of Commissioner Copps: Rick Chesson
Office of Commissioner Adelstein: Rudy Brioché
Office of Commissioner Tate: William Freedman
Office of Commissioner McDowell: Cristina Pauzé
Media Bureau: Monica Shah Desai (Chief), Roy J. Stewart, Keith Larson, Barbara Kreisman, Eloise Gore, Mary Beth Murphy, Steven Broecker, and Hossein Hashemzadeh

¹ Representatives of the CBA attending one or more of the meetings included Lawrence Rogow (President), Amy Brown (Executive Director), Jason S. Roberts, Ronald J. Bruno, Gregory J. Herman, Wendy Herman, Paul Koplin, and counsel Peter Tannenwald, Nathaniel J. Hardy, and Justin Faulb (law clerk).

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The points covered in the discussions were summarized in a paper document left with Commission personnel that read as follows:

“Class A and LPTV stations are viewed over-the-air more than any other class of station, and their signals have the lowest signal strength. They must be protected everywhere their signals are actually viewed, not just to their interference-protected contour, as these stations are in fact often viewed beyond that contour.

“Class A and LPTV operators have serious concerns that any product that is disseminated to the general public that can roam through the TV bands will result in interference to viewing of their stations. If ‘White Spaces’ operations are authorized at all, whatever technology is used to detect and avoid occupied TV channels must block out channels occupied by Class A and LPTV stations that are receivable by a rooftop antenna. It will be much more difficult to accomplish this objective if the channels are chosen by each computer rather than by a centralized base station that has sensitive receiving equipment that can anticipate the strength of a broadcast signal throughout the base station’s coverage area.”

Very truly yours,



Peter Tannenwald

cc: All Meeting Participants (via e-mail)