

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Unlicensed Operation in the TV Broadcast Bands	)	ET Docket No. 04-186
	)	
Additional Spectrum for Unlicensed Devices Below 900 MHz and in the 3 GHz Band	)	ET Docket No. 02-380
	)	

**COMMENTS OF SONY ELECTRONICS INC.**

The use of personal/portable devices in the unlicensed portion of the TV broadcast bands (so called, “white spaces”) is an interesting proposition that Sony Electronics Inc. (“Sony”) is quite eager to further explore. Indeed, the safe and effective use of these white spaces could bring affordable and accessible Internet access as well as many other benefits to consumers. However, Sony believes that in light of the Federal Communications Commission’s (“Commission”) recent test results of two portable white spaces prototypes it is pertinent to further investigate the efficacy of the technology and the capacity to create devices that will not interfere with over-the-air and cable signals.

The results of the Commission’s tests released on July 31, 2007, indicate that the prototypes failed to accurately detect and avoid the frequencies that were utilized. In addition, the test revealed the susceptibility of “direct pick up” interference of televisions tuned to a cable signal.<sup>1</sup>

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<sup>1</sup> See *Initial Evaluation of the Performance of Prototype TV-Band White Space Devices*, OET Report, FCC/OET 07-TR-1006 (July 31, 2007) (“FCC Device Report”); *Direct-Pickup Interference Tests of Three Consumer Digital Cable Television Receivers Available in 2005*, OET Report, FCC/OET 07-TR-1105 (July 31, 2007) (“FCC Direct-Pickup Interference Report”).

As such, Sony believes that it is quite likely that further testing and exploration is necessary to create devices that will not interfere with over-the-air and cable signals. Therefore, Sony is willing to work with the Commission and all interested parties to assist in the development of technology that commonly benefits consumers, device manufacturers, and everyone who relies on an uninterrupted over-the-air and cable television signals.

Respectfully submitted,

/s/ Joel K. Wiginton

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