NEW AMERICA
FOUNDATION

October 2, 2007

Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Unlicensed Operation in the TV Broadcast Bands, ET Docket No. 04-186

Dear Ms. Dortch:

On September 26, on behalf of the Public Interest Spectrum Coalition (PISC)[1] and the New America Foundation, Michael Calabrese, Sascha Meinrath and Paul Kolodzy met with Julius Knapp, Rashmi Doshi, Ronald Chase, Ahmed Lahjouji, Hung Le, Geraldine Matise, Bruce Romano, Alan Stillwell, Hugh Van Tuyl, and Saurbh Chahabra of the Office of Engineering and Technology.

The primary purpose of the meeting was to inquire into the OET's plans to do further testing on issues related to the feasibility of white space devices avoiding harmful interference. Mr. Calabrese asked if OET planned to replicate and/or validate, the field tests submitted on September 20, 2007 by Microsoft Corp. and Philips Electronics. He asked which technical issues remain unresolved, noting that Mr. Kolodzy and the engineers at Kansas University who earlier conducted interference measurements submitted into the docket stood ready to assist, resources permitting. Mr. Kolodzy observed that spatial correlation measurements, indicating the enhanced detection capabilities of WSDs relying on cooperative sensing, may be particularly valuable.

Mr. Calabrese and Mr. Meinrath each expressed the view that the -114 dBm detection threshold proposed by the White Spaces Coalition is overly stringent considering both the propagation loss data filed earlier, as an attachment to the NAF, et al. technical comments on January 31, 2007, the huge opportunity costs for wireless service and innovation

[1] The ad hoc Public Interest Spectrum Coalition's members include, for purposes of this proceeding, New America Foundation, Media Access Project, Free Press, Consumers Union, Consumer Federation of America, Champaign Urbana Community Wireless Network, EDUCAUSE, Public Knowledge, US PIRG, Leadership Conference on Civil Rights, National Hispanic Media Coalition, and other nonprofit consumer, media reform, community technology and social justice organizations.

associated with allowing spectrum to lie fallow because in a few places a high-gain antenna could view a signal that most of the shrinking share of over-the-air viewers would find to be below the threshold of visibility, and the decreased likelihood of hidden nodes due to spacial correlation and cooperative sensing among two or more WSDs.

Mr. Calabrese, Mr. Meinrath, and Mr. Kolodzy offered to keep the OET informed about any additional measurements that PISC is able to conduct through University of Kansas labs or elsewhere.

Sincerely yours,

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