

BINGHAM

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October 5, 2007

VIA ELECTRONIC FILING

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

Re: **NOTICE OF *EX PARTE* MEETINGS**

ET Docket No. 04-186; Unlicensed Operation in the TV Broadcast
Bands

Dear Ms. Dortch:

On October 4, 2007, Shure Incorporated ("Shure") met with the Office of Engineering and Technology ("OET") to discuss Docket No. 04-186. Julius Knapp, Bruce Romano, Geraldine Matise, Alan Stillwell, Ira Keltz, Ron Chase and Hugh Van Tuyl were in attendance on behalf of OET. Attending this meeting on behalf of Shure were Ahren Hartman, Director, Platform Planning, and Mark Brunner, Senior Director of Brand Management, along with Catherine Wang and Tim Bransford of Bingham McCutchen LLP, outside counsel to Shure.

During this meeting Shure discussed the importance of establishing an adjacent channel plan that maintains "clean" spectrum free from unlicensed devices for wireless microphone operations. Shure also discussed a number of essential test parameters that must be incorporated into any future test program the Commission might conduct to more thoroughly evaluate the ability of prototype unlicensed personal/portable devices to operate in the so-called "white spaces" without creating harmful interference to incumbent services. Shure noted that the prior tests conducted on prototype devices submitted by Microsoft Corp. and Philips Electronics North America only tested one small element of a broader frequency avoidance scheme, and stressed that the ability to sense a wireless microphone or DTV transmission under a controlled setting does not by itself demonstrate that future unlicensed devices can successfully operate without creating massive interference for incumbent operators. In particular, Shure urged the Commission to test all of IEEE 802.22's Dynamic Frequency Selection ("DFS") parameters that Shure has previously proposed and placed in the record, including: channel availability check time, channel detection time, and channel move time.

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If you have any questions regarding these meetings, please do not hesitate to contact the undersigned.

Very truly yours,

/s/

Catherine Wang
Timothy L. Bransford

cc (by email): Julius Knapp
Bruce Romano
Geraldine Matise
Alan Stillwell
Ira Keltz
Ron Chase
Hugh Van Tuyl