



October 22, 2007

Mr. Kevin J. Martin, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Chairman Martin:

I am writing to express my concerns regarding a proposal pending before the FCC in OET Dockets 04-146 and 02-380. This proposal would authorize the operation of personal and portable unlicensed transmitting devices in the so-called television "white spaces."

Placing these unlicensed devices in the TV band may cause unacceptable interference to over-the-air TV reception just as the transition from analog to digital television is underway. It is my understanding that there is not yet any consensus among technical people as to whether it is possible for the proposed unlicensed devices to operate in a useful manner without at the same time causing interference to TV reception.

The threat to digital stations is reported to be even greater than to analog stations. KBDI already has three program streams on its digital station and is working on plans to add at least two more designed for under-served groups within our coverage area. These extra program streams are only available over the air. If unlicensed transmitters inadvertently cause interference the new program streams will not be available.

Because there is no industry consensus, it is up to the FCC to make very carefully reasoned judgments based on sound engineering principles before deciding whether such devices can safely be authorized at all. If the decision is that they can be, then the same careful judgment must be used in sorting through the conflicting claims of the opponents and proponents in arriving at the technical characteristics and operating rules.

I urge that the FCC proceed with extreme caution and not reach hasty conclusions under pressure from the proponents of the unlicensed devices. This matter is too important to be brought to a conclusion until full technical data is available and field testing is completed.

Sincerely,


Willard D. "Wick" Rowland, Jr.
President and CEO