

COVINGTON & BURLING LLP

1201 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2401
TEL 202.662.6000
FAX 202.662.6291
WWW.COV.COM

BRUSSELS
LONDON
NEW YORK
SAN FRANCISCO
WASHINGTON

JONATHAN D. BLAKE
TEL 202.662.5506
FAX 202.778.6291
JBLAKE@COV.COM

June 26, 2008

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
12th Street Lobby, TW-A325
Washington, DC 20554

Re: Ex Parte Presentation
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

On Wednesday, June 25, David Donovan (President, MSTV), Victor Tawil (Senior Vice President, MSTV), Bruce Franca (Vice President, Policy and Technology, MSTV), Jane Mago (Senior VP & General Counsel, National Association of Broadcasters), and the undersigned, counsel for MSTV met with Commissioner Jonathan Adelstein and his Legal Advisor, Renée Crittendon, to discuss the above designated white spaces proceeding.

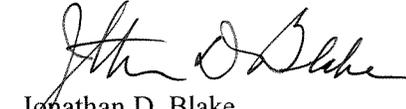
They made the point that MSTV's, NAB's and broadcasters' overarching concern is protecting the American public from destructive interference to its highly valued and widely relied upon local and universal television service.

OET's tests have demonstrated that unlicensed devices cannot rely on sensing technologies to avoid interference. Under appropriate circumstances and conditions, they may be able to rely, instead, on geolocation technologies. This is true for any unlicensed device operating in television broadcast spectrum.

But that is not the end of the steps necessary to protect the public against interference. Even with geolocation technologies, the FCC must also focus on protections against adjacent channel interference, requirements to assure an adequate database to support geolocation methodologies, robust certification procedures, and the powerful and effective policing mechanisms. Adjacent channel issues also are vital to protecting wireless microphone service and ways of affording protection to wireless microphone services were discussed in the meeting.

MSTV and NAB emphasized the importance of working with OET to address these issues.

Respectfully submitted,



Jonathan D. Blake
Counsel to MSTV

cc: Commissioner Adelstein
Renée Crittendon
David Donovan
Jane Mago
Victor Tawil
Bruce Franca