September 8, 2008

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

Re: ET Docket 04-186

Dear Ms. Dortch:

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, this is to notify you that on September 8, 2008, I met with Charles Mathias and Erika Olsen, advisors to Chairman Martin. The meeting concerned the above captioned proceeding and included discussion of points made in the attached presentation.

Pursuant to the Commission's Rules, one copy of this notice is being filed electronically with the Commission. If you require any additional information please contact the undersigned at (202) 371-6953.

Sincerely,

/s/ Steve B. Sharkey

Steve B. Sharkey
Senior Director, Regulatory and Spectrum Policy

Cc: Charles Mathias
Erika Olsen

Motorola, Inc., Global Government Affairs
1455 Pennsylvania Ave., Suite 900, Washington, DC 20004 T: (202) 371-6900

TV Whitespace: A Solution to Move Forward

Recommendation: Overview

- Move forward now with R&O allowing unlicensed TVWS Devices with geolocation
  - Testing demonstrates reliability of geolocation
  - Continue to consider parameters for sensing-only devices
- Accept applications for certification of TVWS devices as R&O effective date; allow sale and use of certified devices beginning 2/17/09
- Adopt rules for Fixed, Mobile and Portable TVWS Devices that enable useful operation and protection of TV reception
- Allow 4W EIRP, 2W conducted power for Fixed and Mobile TVWS Devices; 400 mW EIRP for portable TVWS devices
- Allow TVWS use on adjacent channels; protection through safe D/U ratios
- Use combination of Geolocation, Beacons and Database entry to accommodate authorized wireless microphones
  - FCC Broadway and stadium testing shows wireless mics today successfully operate co- channel with digital and analog TV stations
  - Motorola will demo low cost beacon operation at FCC Lab

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Benefits of Fixed, Mobile and Portable Use TVWS

Utility,
Public Works,
Enterprise

200mW

4W

Coverage circles not drawn to scale

Cost-Effective Rural Broadband

- Service to the unserved/underserved Public
- Expanded range and capacity for competitive WiSP deployments
- Increased data rates for rural communities provides new opportunities for economic growth and learning

Competitive WISP

Mobile and Portable Broadband applications

- Improved safety, security and productivity at powerplants, manufacturing facilities and a wide variety of industrial operations
- Fulfill need for wide area mobile office/video solutions and vehicular area networks for local and state non mission-critical operations

200mW

4W

Coverage circles not drawn to scale

Higher power (4W EIRP) is essential to meet coverage requirements

- Coverage for 200mW increases site requirements by 4 - 6X over 4W coverage
- Increased infrastructure costs and requirements for low power limits jeopardizes rural benefits

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Adjacent Channel Usage is Critical for TVWS Operation

- **Eliminating adjacent channel use significantly reduces available WS spectrum**
  - Downtown Chicago goes from 8 available channels to 0
  - NYC goes from 3 available channels to 0
  - Los Angeles goes from 2 available channels to 0
- **There is no technical reason to prevent adjacent channel TVWS use**
  - Geolocation database provides full protection based on appropriate D/U ratio
- ***There is no reason to limit adjacent channel use to accommodate wireless microphones***
  - Proposed TVWS usage of adjacent channels is much more restrictive than current wireless microphone use
    - Wireless microphones already allowed up to 250mW *unrestricted* use of adjacent channels
    - no significant interference reported, even when operating co-channel…
  - Many adjacent channels still available for microphones due to inherent TVWS geo-location operating restrictions
    - e.g., at Fed Ex field, only 1 utilized adj. ch. practical for TVWS use – *all other mic channels (10/11) unused…*
    - e.g., *at Broadway, all six utilized mic channels would not be utilized by geo-location enabled TVWS devices…*

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Beacon Protection Scenario

For temporary, unplanned events, such as a licensed wireless microphone used by a news organization to cover a story, a beacon could be utilized

1. Microphone Tx to Rx (desired)
2. Beacon to WSD (desired)
3. WSD to Microphone Rx (interference)

Whitespace Device Transmitter

2

3

1

NEWS7

Necessary protected radius 100 m typical for unplanned events

reporter

camera operator

news gathering truck w/ beacon

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Summary / Motorola Recommendations

The technology to utilize the TV White Space while providing necessary protection is available and proven

- Move forward to allow unlicensed TVWS Devices with Geolocation capabilities
- Geolocation will provide reliable protection for both co- and adjacent-channel TV stations and wireless mics

Power levels must be sufficient to realize rural broadband benefits

- 4W EIRP TVWS power level will enable many beneficial and cost-effective services without impacting TV reception or wireless mic usage.

A variety of methods exist for protecting wireless microphones

- Beacons and/or channel/location/time/power-specific database entries can be used to accommodate additional mic channels if/where needed

Many of the advantages and strength of the TV white space will be lost if the spectrum is auctioned

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