

I am concerned about the negative impact of potential FCC changes to the UHF television band on "white spaces" and the commercial industry.

Wireless devices can cause catastrophic interference if operated on the same frequency as wireless audio

devices. The effect on a wireless microphone could be decreased range (perhaps to as little as 10 feet), an

increase in the number and severity of audio dropouts, or even complete interruption of the signal.

Tests

have also proven that White Space devices can interfere with DTV reception and cable TV signals.

InfoComm proposes that in each market the FCC set aside eight 'protected' TV channels (2 in the VHF band

and 6 in the UHF band), in which unlicensed wireless microphones could operate without interference from

White Space devices. The devices would check an online database and avoid transmitting on the channels

that are 'protected'. InfoComm is concerned that FCC plans to set aside only two TV channels for

unlicensed wireless mics is insufficient. Two TV channels (12 MHz of spectrum) would only be

enough for

four to ten wireless microphones – less if other wireless mic users are nearby. This is insufficient for many

users.

I am also also concerned that the FCC proposal relies on "spectrum sensing" technology for wireless microphones operating outside of the two 'protected' channels. This would require White Space devices to

detect DTV stations and wireless audio equipment, and avoid transmitting on the frequencies that they are

using. However, the FCC's own tests have demonstrated that this technology often fails to detect that a

wireless microphone is present, even at very short distances. What is the purpose of the Commission conducting tests if the Commission's decision fails to take test results into consideration?

In situations where many wireless audio devices are in use, several open TV channels may be required.