

Catherine Wang
Direct Phone: 202.373.6037
Direct Fax: 202.373.6001
catherine.wang@bingham.com

October 24, 2008

VIA ELECTRONIC FILING

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

Re: ***EX PARTE NOTICE***
ET Docket No. 04-186; WT Docket Nos. 08-166 and 08-167

Dear Ms. Dortch:

On October 23, 2008, Shure Incorporated (“Shure”) met with Wayne Leighton, Special Advisor to Commissioner Tate to discuss Docket No. 04-186. Attending this meeting on behalf of Shure were Ahren Hartman, Director of Platform Planning at Shure, along with Catherine Wang of Bingham McCutchen LLP, outside counsel to Shure.

During this meeting, we discussed the Commission’s announcement that the Second Report and Order and Memorandum Opinion and Order addressing unlicensed operation in the television broadcast bands has been tentatively placed on the Commission’s agenda for the next open meeting on November 4, 2008. We also discussed the poor performance of spectrum sensing technology during laboratory and field tests and reiterated our support for opening the Commission’s Test report for public comment. We further discussed the need to subject the Commission’s spectrum sensing Test Report to the peer review process as the Commission did before issuing the Test Report for the first round of Commission testing in this proceeding. We discussed Shure’s view that the Commission should not authorize spectrum sensing at this time.

We discussed how the Commission’s announced decision is a departure from FCC precedent as it disproportionately burdens the existing users in favor of an emerging spectrum entrant. In particular, the Commission’s proposed order does not define adequate protection from interference, alternative comparable spectrum, or otherwise provide for an appropriate transition.

As an alternative interference protection plan, Shure reviewed its proposal for a solution that would use geolocation and protected channels to safeguard incumbent wireless microphone operations from devastating interference. Shure reemphasized the need for adequate protected channels for wireless microphone operations in the core TV bands after the DTV transition. Specifically, at a minimum, Shure noted that 8 protected channels (6 UHF/2 VHF) would be necessary to accommodate small-scale microphone

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Bingham McCutchen LLP
2020 K Street NW
Washington, DC
20006-1806

T 202.373.6000
F 202.373.6001
bingham.com

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operations for the initial 36 month period following the DTV transition, and 6 protected channels (4 UHF/2 VHF) thereafter. We believe that a plan that identifies far fewer or even no protected channels is not a workable solution for wireless microphones and would provide inadequate protection, making a successful transition highly unlikely. Shure also discussed the need for a dynamic geolocation database to protect large-scale events and Commission's Rules that provide specific parameters regarding the operation and implementation of such a database.

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

Very truly yours,

/s/

Catherine Wang

cc (by email): Wayne Leighton