



October 24, 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 October 23, 2008, Stu Overby and I had separate meetings and discussions with Renée Crittendon, Legal Advisor to Commissioner Adelstein; Bruce Gottlieb, Legal advisor to Commissioner Copps; Wayne Leighton, Special Advisor to Commissioner Tate; and Julius Knapp, Chief of the Office of Engineering and Technology regarding the above captioned proceeding.

We expressed Motorola's support for the Commission's TV White Space (TVWS) initiative and urged that the Commission forward with adoption of rules on November 4. Based on over four years of debate, testing and analysis, the Commission is well positioned to move forward with rules the enable use of the TV White Spaces on an unlicensed basis while fully protecting incumbent operations.

We also expressed support for use of desired-to-undesired ratios to protect adjacent channel operations. Over the course of the proceeding Motorola has made numerous filings demonstrating that the D/U ratios traditionally used for protecting adjacent channels provides conservative protection and are appropriate in the context of TVWS. This approach permits more efficient use of the TVWS by allowing TWVS devices to vary power depending on the adjacent channel signal strength, thereby permitting power above the proposed 40 mW in areas where the adjacent channel signal strength is strong enough. If the Commission does adopt a single power level for adjacent channel operations, it should not decrease it from the proposed 40 mW given the importance of access to adjacent channels.

In addition, we supported allowing use of tethered mobiles at the same 4W limit proposed for fixed operations. Mobiles tethered wirelessly to a fixed access point can be controlled very similarly to fixed devices and, with the geolocation approach, will fully protect incumbents. Permitting such mobile use will enable a wide variety of needed services, including new broadband options for critical infrastructure providers and enterprises that may operate in areas where no other broadband option exists.



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: Renée Crittendon
Bruce Gottlieb
Wayne Leighton
Julius Knapp