

PENNSYLVANIA ASSOCIATION OF BROADCASTERS

Richard E. Wyckoff
President
rwyckoff@pab.org

October 31, 2008

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NOV - 7 2008

Federal Communications Commission
Office of the Secretary

8501 Paxton Street
Hummelstown, PA 17036
Voice (717) 482-4820
Fax (717) 482-1111
www.pab.org

Dear Chairman Martin and Commissioners Copps, Adelstein, Tate and McDowell:

I am writing you today as the State Technical Chair of the Emergency Communications Committee for the State of Pennsylvania because I am concerned about the impact of white spaces devices on the television broadcast spectrum. These devices have the potential to cause harmful interference to television stations, and since they are "Unlicensed Devices" the interference would be next to impossible to track down.

As you know, the public relies heavily on the broadcasters for emergency information. I realize that other technologies like cell phone "text messaging" is sometimes used to alert the public of emergencies, but the message they can deliver is only a few hundred characters, which cannot explain in detail what actions the public needs to take during an emergency. The public relies on the broadcasters for the detailed information to keep them safe during an emergency. If white spaces devices are allowed they could interfere with the reception of television stations, and put the public at risk.

I know that the FCC Office of Engineering and Technology has performed tests in your labs of the White Space devices that yielded good, but mixed results. The lab is a starting place to test the devices, but once all these units are out in the real world working together, it is very likely they could cause harmful interference.

I urge you to delay any vote and decision on White Space devices until the public has had a reasonable opportunity to review and comment upon the engineering report, and the FCC has given due consideration to those comments. It is my opinion that extensive "Real World" testing needs to be completed before these devices are even considered.

Sincerely,

Matthew Lightner - President
Lightner Electronics Inc.

Engineering Consultant/ PA EAS Technical Chairman
Pennsylvania Association of Broadcasters

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Federal Communications Commission
Office of the Secretary

-----Original Message-----

From: Kingsley E. Kelley [mailto:kkelley@ktvl.com]
Sent: Friday, October 31, 2008 2:31 PM
To: Kevin Martin
Cc: Michelle Carey
Subject: White Spaces

Dear Commissioner -

I respectfully request that you remove the white space discussion from the agenda for November 4th. This is a potentially serious issue for small market television stations in mountainous regions like ours, where we depend on a network of translators in order to deliver our signal to residents in more remote areas. Permitting unlicensed devices to operate in this myriad of frequencies could rob these over-the-air viewers and small, independent cable systems of access to a watchable feed of our news, informational and entertainment programming. Please allow time for public comment and testing before moving forward with a decision.

Thank you for considering this request,
Kingsley

=====

Kingsley Kelley
General Manager
KTVL-TV: CBS & The CW
1440 Rossanley
Medford, OR 97501
(541) 773-7373
www.ktvl.com

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From: Raschio, Greg [mailto:raschio@kval.com]
Sent: Friday, October 31, 2008 2:39 PM
To: Kevin Martin
Cc: Michael Copps; Jonathan Adelstein; Deborah Tate; Robert McDowell
Subject: White space

NOV - 7 2008

Federal Communications Commission
Office of the Secretary

Dear Chairman Martin;

I am writing to urge you and your fellow commissioners to suspend the planned vote on November 4, 2008 on a proposal to allow unlicensed devices to operate in the television broadcast spectrum. Further, to delay any such vote on this proposal until adequate time is provided for public comment and to fully vet the FCC Office of Engineering and Technology's recent report on this matter.

It is my understanding the OET study has demonstrated, beyond any doubt, that unlicensed devices relying exclusively on spectrum sensing will cause harmful interference to millions of consumers' digital television sets and government subsidized converter boxes. The current proposal will undermine the delivery of television programming and is entirely inconsistent with the technical data contained in the FCC's report. Additionally, the FCC tests show there will be interference to cable viewing; and the tests also indicate these devices will interfere with wireless microphones that are used to provide live sports, news coverage and live performances.

Our company, along with every other television broadcaster in this country, has worked extremely hard to prepare for the digital transition and educated viewers. Disruptive interference of digital signals, particularly during this period, would be most harmful to the process. This is surely not the time to move forward with allowing unlicensed devices to operate in the television broadcast spectrum.

Warmest regards,

Greg Raschio
VP/General Manager
KVAL, KPIC, KCBY
541.342.4961
graschio@kval.com

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From: Julie.Lewis@dps.la.gov [mailto:Julie.Lewis@dps.la.gov]
Sent: Friday, October 31, 2008 4:56 PM
To: Kevin Martin
Subject: Docket No. 04-186 "White Spaces"
Importance: High

October 31, 2008

Chairman Kevin Martin
Federal Communications Commission
445 12th Street, SW
Washington, DC 20544
Kevin.martin@fcc.gov

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NOV - 7 2008

Federal Communications Commission
Office of the Secretary

RE: ET Docket No. 04-186; Introduction of Unlicensed Devices into the
"White Spaces" Television Band

Dear Chairman Martin:

On behalf of the residents of Louisiana, I am writing to express my concern regarding a pending proposal before the Federal Communications Commission (FCC). This proposal would allow *unlicensed* personal and portable transmitting devices in what is known as "TV White Spaces." Unfortunately, multiple publicized tests have failed to indicate that these "White Spaces" can be occupied by such unlicensed devices without interfering with over-the-air TV/radio programming. Additionally, the ability to trace and negate the source of such interference is virtually impossible for consumers.

The Louisiana AMBER Alert Plan, sent via the statewide Emergency Alert System (EAS), relies predominantly upon the ability of every television and radio broadcast station in Louisiana to provide the public with interference-free access to this communication and information so our agency can disseminate information quickly and without obstruction that a child has been abducted and the life of that child is in danger of serious bodily injury and/or death. If such critical information is impeded by "White Space"-interference, the life of a child could be placed into superfluous risk.

Before such unlicensed devices are permitted to utilize "White Spaces", I respectfully request the FCC can conclusively determine there will no interference with over-the-air broadcasting.

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Sincerely,

Sgt Julie Lewis 1530

Sgt. Julie Lewis
Louisiana State Police - North District Public Affairs
Louisiana AMBER Alert Coordinator
Email: Julie.Lewis@dps.la.gov
Cell: (318) 237-8270

ET Docket 04-136

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Federal Communications Commission
Office of the Secretary

-----Original Message-----

From: Gail Gula [mailto:ggula@whec.com]
Sent: Tuesday, October 28, 2008 3:58 PM
To: Michelle Carey
Subject: Objection to Unlicensed Operation in the TV Broadcast Bands

Dear Legal Advisor Michelle Carey:

I am extremely disappointed with Chairman Kevin Martin's attempts to vote on the highly complicated and controversial rules for "white space" devices on November 4, a mere 20 days after the release of the Office of Engineering and Technology's technical report.

This proposal could have a devastating impact on television and it should not be rushed through the Commission without sufficient time for analysis and comment. The Commission has studied this issue for nearly 4 years yet it now intends to vote on the matter without any opportunity for public comment less than 3 weeks after the release of the report.

If these companies are allowed to manufacture and sell devices that ultimately cause interference to televisions and microphones, there will be no way to determine if the interference is coming from a next door neighbor, a passing car or even within one's own home. Moreover, once the unlicensed devices are in the market, there will be no way to extract them. The FCC lacks the means to find and shut down interfering devices.

There are ways in which the Commission could utilize the unused portions of the television spectrum without causing irreparable harm to television viewing. These approaches could be used to deliver broadband to unserved areas of the country immediately and would not cause interference to television.

The Commission should not vote on this matter without providing for public comment and I urge you to remove it from the November 4 meeting agenda.

Sincerely;

Arnold Klinsky
VP/General Manager
WHEC-TV
191 East Avenue
Rochester, NY 14604

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----- Original Message -----

From: HOWFIELD, LISA <lisahowfield@kvbc.com>

To: Kevin Martin; Michelle Carey; Michael Copps; Rick Chessen; Jonathan Adelstein; Rudy Brioche; Deborah Tate; Amy Blankenship; Robert McDowell; Rosemary Harold

Sent: Tue Oct 28 17:20:11 2008

Subject: White Space Interference

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Federal Communications Commission
Office of the Secretary

To all Concerned;

I am extremely disappointed with Chairman Kevin Martin's attempts to vote on the highly complicated and controversial rules for "white space" devices on November 4, a mere 20 days after the release of the Office of Engineering and Technology's technical report.

This proposal could have a devastating impact on television and it should not be rushed through the Commission without sufficient time for analysis and comment. The Commission has studied this issue for nearly 4 years yet it now intends to vote on the matter without any opportunity for public comment less than 3 weeks after the release of the report.

If these companies are allowed to manufacture and sell devices that ultimately cause interference to televisions and microphones, there will be no way to determine if the interference is coming from a next door neighbor, a passing car or even within one's own home. Moreover, once the unlicensed devices are in the market, there will be no way to extract them. The FCC lacks the means to find and shut down interfering devices.

There are ways in which the Commission could utilize the unused portions of the television spectrum without causing irreparable harm to television viewing. These approaches could be used to deliver broadband to unserved areas of the country immediately and would not cause interference to television.

The Commission should not vote on this matter without providing for public comment and I urge you to remove it from the November 4 meeting agenda.

Lisa Howfield
General Manager
KVBC TV 3
NBC for Las Vegas, Nevada

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From: Rick Andrycha [mailto:Rick.Andrycha@kayutv.com]
Sent: Friday, October 31, 2008 3:20 PM
To: Kevin Martin
Subject: White Spaces Vote
Importance: High

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Federal Communications Commission
Office of the Secretary

FCC Chairman Martin:

Please help the Commission regain its senses ... along with the public's respect.

Postpone Nov 4th's scheduled White Spaces vote until the facts can be known.

Don't rush through this crucial issue because of someone else's Agenda. The Commission needs to allow time for public comments and to fully vet the OET's report before **any** proposal comes to a vote.

Don't negate the DTV transition process that stations have been working hard to implement. Permitting the use of unlicensed devices in the TV spectrum is expected to cause major interference to millions of over-the-air **and** cable viewers.

Postpone the vote. **Get the facts.**

Rick Andrycha
Director of Programming
& Broadcast Operations
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