



**Key Bridge Global LLC**  
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Jesse Caulfield, President & CEO

September 8, 2009

**VIA ELECTRONIC FILING**

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

RE: ET Docket No. 04-186      Unlicensed Operation in the TV Broadcast Bands  
Ex Parte Presentation

Dear Ms. Dortch:

On September 08, 2009, Jesse Caulfield, President and CEO, Mr. Shep Kendall, Chief Software Engineer, Key Bridge Global LLC, and Jay Evans, President, Avcom of Virginia, met with the following representatives of the Office of Engineering & Technology: Julius Knapp, Chief; Ronald Repasi, Deputy Chief; Ira Keltz, Deputy Chief; Geraldine Matise, Chief Policy & Rules; Mark Settle, Deputy Chief Policy & Rules and Hugh Van Tuyl, Senior Electronics Engineer.

The parties discussed the recently adopted rules governing unlicensed operation in the television broadcast bands ("TV White Space"). In the meeting Key Bridge explained how the current Rules could create problematic end-user incentives and presented some ideas for how these might be corrected. Key Bridge also shared our observations and opinions about how a stable, sustainable and consumer-friendly environment might be fostered that balances innovative unlicensed TV bands products and broadband services with shared responsibility for interference avoidance.

Key Bridge is a Virginia company and candidate for FCC authorization to operate a TV bands database. We have provided a number of contributions and suggestions to help to move the process forward including market analysis, a system architecture, methods and practices plus a transaction model and security framework. Our solution is open, standards compliant, extensible and implements a TV bands database that:

- Protects incumbent services;
- Publishes unlicensed availability on a non-discriminatory basis;
- Maximizes consumer convenience and transparency, and
- Executes FCC rules and regulations as a neutral party.

This letter is filed electronically, in accordance with Section 1.1206(b) of the Commission's Rules, 47 C.F.R. § 1.1206(b), for inclusion in the record in this proceeding. Kindly refer any questions or correspondence regarding this matter to the undersigned.

Best regards,

/s/

Jesse Caulfield

cc: Julius Knapp  
Alan Stillwell  
Ira Keltz  
Ronald Repasi  
Geraldine Matise  
Mark Settle  
Hugh Van Tuyle  
Alan Stillwell  
Paul De Sa