



September 10, 2009

Via the ECFS

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

Re: Unlicensed Operation in the TV Broadcast Bands, ET Docket No. 04-186
Database Administration Public Notice

Dear Ms. Dortch:

As the FCC recognized in its recent Notice of Inquiry on wireless innovation, Spectrum Bridge, Inc. operates databases that promote efficient use of spectrum via secondary markets.¹ Spectrum Bridge seeks to use this experience to facilitate management of the TV white spaces, including as a candidate to operate a white spaces database.² Accordingly, Spectrum Bridge was very interested to read the recent ex parte filed by Dell and Microsoft regarding the upcoming Public Notice on Database Administration.³

Spectrum Bridge agrees that the issues outlined in the Dell/Microsoft letter for inclusion in the Public Notice will be helpful in allowing the FCC and industry to move forward quickly to enable white space databases. In particular, Spectrum Bridge shares the view that the role of the database should be to provide white space devices information regarding available channels at a location rather than to “authorize” particular white space operations or adjudicate allegations of harmful interference, and that a database operator should not be liable for FCC rule violations as long as it collects

¹ See *Fostering Innovation and Investment in the Wireless Communications Market; A National Broadband Plan For Our Future*, Notice of Inquiry, ¶ 43 (rel. Aug. 27, 2009).

² For example, Spectrum Bridge created the Show My White Space website, available at <http://www.showmywhitespace.com>, to promote awareness of the white spaces and the impacts of the FCC’s white spaces rules.

³ See Letter from Edmond Thomas, Senior Technology Policy Advisor for Dell and Microsoft, to Julius Knapp, Chief, Office of Engineering and Technology, ET Docket No. 04-186 (filed Aug. 27, 2009).

valid information from eligible registrants and responds accurately to channel availability requests.⁴ In addition, Spectrum Bridge agrees that database providers should be able use the communications protocols of their choice, provided that those protocols are open and will allow device manufacturers to create products that work with a particular database.⁵

Finally, the Dell/Microsoft letter notes the widespread support in the record for a class of devices that operate without a spectrum sensing requirement.⁶ Spectrum Bridge agrees that geolocation-only devices could accommodate “special events” such as electronic news gathering operations by communicating with a database and learning about additional channel restrictions that accommodate Part 74 low power auxiliary devices within the 20 minute time period described by Dell and Microsoft.⁷

Pursuant to Section 1.1206(b) of the Commission’s rules, this letter is being filed electronically in the above-referenced docket. Please feel free to contact me if you have any questions.

Sincerely yours,

/s/
Richard Licursi
President & CEO

⁴ *See id.* at 2-3.

⁵ *See id.* at 3-4.

⁶ *Id.* at 5.

⁷ *See id.*