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September 10, 2009

VIA ELECTRONIC FILING

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

Re: ***EX PARTE NOTICE***

Revision to Rules Authorizing the Operation of Low Power Auxiliary Stations in the 698-806 MHz Band, WT Docket Nos. 08-166 and 08-167; Unlicensed Operation in the TV Broadcast Bands, ET Docket No. 04-186

Dear Ms. Dortch:

On September 9th, 2009, Shure Incorporated (“Shure”) met with Erin McGrath, Legal Advisor to Commissioner Baker, to discuss ET Docket No. 04-186 and WT Docket Nos. 08-166 and 08-167. Attending this meeting on behalf of Shure were Mark Brunner, Senior Director, Global Public Relations, Edgar Reihl, Principal Engineer, and Catherine Wang and Tim Bransford of Bingham McCutchen LLP, outside counsel to Shure.

During this meeting Shure discussed the critical public interest benefits of the many and varied wireless microphone applications and the complex challenges of introducing new unlicensed devices into the core TV bands, spectrum that is already heavily utilized in most densely populated areas of the country. Shure reemphasized how the combination of safeguards, including spectrum sensing, implementation of a geolocation database, power limits, etc., as set forth in the Second Report and Order (“Order”) in ET Docket No. 04-186, are necessary to protect wireless microphones from interference from unlicensed devices allowed to operate in the core TV bands.

With respect to WT Docket Nos. 08-166 and 08-167, we discussed Shure’s ongoing voluntary efforts to educate wireless microphone users and dealers about the Commission’s proposed changes to rules permitting secondary low power auxiliary service in the 700 MHz band and to encourage users to transition out of that spectrum. Shure highlighted the significant practical challenges of a nationwide migration of installed equipment into other bands, including technical, logistical and financial issues that cannot be overcome without considerable planning and effort. Shure also reiterated its view that identifying a date for the transition would further the migration of secondary low power auxiliary operations out of the 700 MHz band. Finally, we discussed why reclassification of wireless microphones as Part 15 equipment or equipment with rights

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“co-equal” to those of Part 15 equipment is unworkable and would be counterproductive. Such a step would greatly jeopardize wireless microphone operations across the country, putting many productions at risk (*e.g.*, TV, music concerts, theater, religious and educational institutions, business conferences, etc.), and also creating adverse economic consequences in an already difficult environment.

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

Very truly yours,

/s/

Catherine Wang
Tim Bransford

CC: Erin McGrath