

AKIN GUMP
STRAUSS HAUER & FELD LLP

Attorneys at Law

January 4, 2010

VIA ECFS

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

Re: WSdb, LLC
Proposal to be Designated TV Band Device Database Manager
ET Docket 04-186

Dear Ms. Dortch:

WSdb, LLC (“WSdb”), by its attorneys, hereby submits the instant proposal (“Proposal”) to the Federal Communications Commission (“FCC” or “Commission”) to be designated as a television band database manager (“Authorized Database Administrator”). The Proposal is submitted in response to the November 25, 2009 public notice inviting entities to apply to serve as Authorized Database Administrators (“Public Notice”).¹

WSdb proposes to provide a database service that performs all of the functions required by the FCC’s rules (*i.e.*, a data repository, a data registration process, and a query process). WSdb does not intend to outsource any of the functionality of its database service to a third party. WSdb also affirms that the database service described in this Proposal will comply with all applicable Commission rules.²

¹ See Office of Engineering and Technology Invites Proposals from Entities Seeking to be Designated TV Band Device Database Managers, ET Docket No. 04-186, Public Notice (rel. November 25, 2009).

² If selected as an Authorized Database Administrator, WSdb is prepared to implement all aspects of the database design described in this Proposal to the extent permitted by the FCC. WSdb is willing to modify its proposed database design as necessary to address any changes requested by the Commission.

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Each of the specific requests for information set forth in the Public Notice and WSdb's responses thereto are set forth below.

I. INFORMATION REQUEST NO. 1

(a) The entity must demonstrate that it possesses sufficient technical expertise to administer a TV bands database.

WSdb has both the technical and management expertise to develop and administer an innovative, high-performance and cost-effective database solution to the challenges presented by operating television band devices ("TVBDs"). WSdb has assembled a team of seasoned professionals with a broad range of technical, financial, management, and other experience to assist in the development, design and operation of a white spaces database. Biographies of these professionals are set forth in Attachment 1(a) hereto.

(b) It must demonstrate that it has a viable business plan to operate a database for the five-year term set forth in Section 15. 715(g) of the rules.

See Attachment 1(b).

(c) To the extent that the proponent will rely on fees from registrations or queries, the proposal should describe the fee collection process.

See Attachment 1(c).

II. INFORMATION REQUEST NO. 2

(a) The entity must describe in detail the scope of the database functions that it intends to perform, such as managing a data repository, performing calculations to determine available channels, and/or registering fixed unlicensed devices and licensed services not listed in the Commission's databases, or how it will have functions performed in a secure and reliable manner by another entity.

See Attachment 2(a) hereto for a description of the database functions to be performed by WSdb. As noted above, WSdb proposes to provide a database service that performs all of the functions required by the FCC's rules (*i.e.*, a data repository, a data registration process, and a query process). WSdb does not intend to outsource any of the functionality of its database service to a third party.

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(b) The entity must also describe how data will be synchronized between multiple databases if multiple databases are authorized and how quickly this synchronization of data will be accomplished.

WSdb will enable synchronization of its data to other Authorized Database Administrators via a web service and a real-time synchronization application programming interface (“API”) that will enable real-time access to certain information contained in the Data Repository maintained by WSdb. Additional details regarding this process are set forth in the description of DB-5 in Attachments 2(a) and 3 hereto.

III. INFORMATION REQUEST NO. 3

The entity must provide diagrams showing the architecture of the database system and a detailed description of how each function operates and how each function interacts with the other functions.

See Attachment 3(a) for a diagram (Figure 3(a)) showing the general architecture of WSdb’s database system.

Attachment 3(b) explains in detail how each of the database functions described in Attachment 2(a) will operate, and how such functions will interact among one another. Specifically, for each of the functions of WSdb’s database, Attachment 3(b) contains the following information:

- (1) Figures. Figures highlighting the specific components of WSdb’s general database system architecture that will be used to implement a particular function;
- (2) Information Flow and Processing. A description of the manner in which a particular function will present data to the database system, the flow and/or processing of such data within the database system, and (if applicable) the flow of data out of the database system; and
- (3) Functional Dependencies. A list of functional dependencies (*i.e.*, those functions that may be required to enable a particular function to perform its task).

IV. INFORMATION REQUEST NO. 4

If the entity will not be performing all database functions, it must provide information on the entities operating other functions and the business relationship between itself and these other entities. In particular, it must address how the Commission can ensure that all of the requirements for TV band database administrators in Section 15.715 are satisfied when database

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functions are divided among multiple entities, including a description of how data will be transferred among these various related entities and other databases if multiple databases are authorized and the expected schedule of such data transfers (i.e., real-time, once an hour, etc.).

As described herein, it is WSdb's intent to perform all database functions. Because WSdb will not be outsourcing any functions to third parties, Information Request No. 4 is inapplicable to the Proposal.

V. INFORMATION REQUEST NO. 5

(a) The entity must describe the methods (e.g., interfaces, protocols) that will be used by TV band devices to communicate with the database and the procedures, if any, that it plans to use to verify that a device can properly communicate with the database.

WSdb's database design will implement an interface through which TVBDs may communicate in an automated fashion with WSdb's system over the Internet using User Datagram Protocol. To enable communication between TVBDs and its system, WSdb proposes to use the defined pieces of information set forth on Attachment 5(a). WSdb intends to make available to manufacturers (at no charge) detailed APIs as well as its source code. To verify that a TVBD can properly communicate with WSdb's database, WSdb's system design will implement a listen and answer protocol.

(b) It must include a description of the security methods that will be used to ensure that unauthorized parties can not access or alter the database or otherwise corrupt the operation of the database system in performing its intended functions.

WSdb is contemplating a layered approach to security for its database design in order to ensure that unauthorized parties cannot access, alter, or corrupt WSdb's database while simultaneously enabling WSdb's database to operate efficiently. The layered approach to be implemented by WSdb is set forth in Attachment 5(b) hereof.

(c) In addition, the entity should describe whether and how security methods will be used to verify that Mode I personal/portable devices that rely on another device for their geographic location information have received equipment authorization.

See Attachment 5(c) for an description of how WSdb will use security methods to verify that Mode I personal/portable devices that rely on another device for their geographic location information have received equipment authorization.

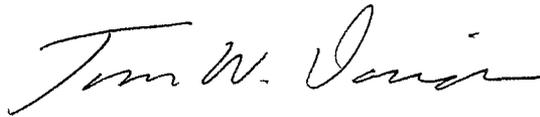
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Please do not hesitate to contact the undersigned with any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom W. Davidson". The signature is fluid and cursive, with the first name "Tom" being the most prominent.

Tom W. Davidson, Esq.
Counsel for WSdb, LLC

Enclosures