

January 5, 2010

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

Re: Notice of Ex Parte Presentation In WT Docket Nos. 08-166, 08-167

Dear Ms. Dortch:

On January 4, 2010, I spoke with John Giusti, Advisor to Commissioner Copps, with regard to the above captioned proceedings. I stated that PISC did not believe that it was necessary to expand the class of Part 74 Subpart H licensees. If the Commission did seek comment on this issue, the Commission should not begin with an assumption that expanding the class of eligible entities would serve the public interest. Further, in the event the Commission solicited comment on expanding the class of eligible entities, the Commission should solicit comment on whether such newly eligible entities would receive the same protection as existing licensees as against authorized TV white spaces devices.

In accordance with FCC regulations, a copy of this letter is being filed with your office.

Sincerely,

Harold Feld
Legal Director