



July 9, 2010

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

RE: Ex-parte Communications
ET docket 04-186
ET docket 02-380

Dear Ms. Dortch:

On Thursday, July 8, 2010, David Donovan (MSTV), Bruce Franca (MSTV), Victor Tawil (MSTV), Lynn Claudy (NAB), Kelly Williams (NAB) and Scott Goodwin (NAB) met with the following members of the Office of Engineering and Technology: Julius Knapp, Alan Stillwell, Geraldine Matisse, Karen Ansari, and Hugh Van Tuyl.

We discussed several issues pertaining to the TV whitespaces proceeding. We expressed concern about proposals that would revise the current requirement that TV whitespace devices must include a database/geolocation system as well as sensing capability. In this regard, we noted that the current geolocation/database proposals that omit sensing capability would not provide sufficient protection for wireless microphones used for on-the-spot local news and emergency coverage.

We reiterated points made in our previous filings on a number of technical issues including the need for minimum bandwidth requirements, power density rules, and power levels of devices operating on adjacent channels. We urged the FCC to use an HAAT rather than height above ground standard for fixed operations. We also observed that the current rules did not allow for mobile operations and that personal/portable devices need to re-establish contact with the database for updated channel availability if moved from place to place. We discussed a number of issues relating to the proposed geolocation/database approach to interference protection.

The attached materials were distributed at the meeting.

Sincerely,

David L. Donovan

MSTV/NAB
Response to Recent Filings
TV White Spaces

Recent Technical Issues

- Sensing only protection available for itinerant wireless microphones
 - Support Philips approach that sensing should be “back-up” for DTV database errors
- Minimum bandwidth requirement needed for TV WS devices
 - FCC DTV receiver tests
- Maintain FCC out of band emission requirements (emission mask)
- No power increase should be permitted – on the contrary maximum power limits for personal/portable devices should be reduced to meet adjacent channel 10 meter protection
- HAAT not height above ground should be used for fixed operations
- Personal/portable devices need to re-establish contact with database if moved from place to place (Rules permit portable not mobile operation)

Recent Database Issues

- Database Administrator needs to be neutral third party
- To make database system work, database must be accurate and devices must respond properly
- Devices must be FCC tested and certified and validated by the database
 - Illegal non-certified devices must be denied service
- Database system must implement and maintain reasonable security measures
- Database and Administrator(s) needs to thoroughly tested prior to implementation