



July 20, 2010

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

Re: Notice of Ex Parte Communication
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

On July 15, 2010, Messrs. David Donovan and Bruce Franca of the Association for Maximum Service Television, Inc. (MSTV); Messrs. Lynn Claudy and Scott Goodwin of the National Association of Broadcasters (NAB); and Jonathan Blake of Covington & Burling LLP, met with Messrs. Brad Gillen and Charles Mathias of Commissioner Baker's office about white spaces matters at issue in the above two proceedings.

MSTV and NAB pointed out that the interference protections in the white spaces rules adopted by the Commission in 2008 are based on a combination of sensing and geolocation/database approaches. Some parties are now urging deletion of the sensing protections in these rules. But geolocation/database protection alone is not sufficient, and even if it were, the current rules are based on the specified combination of sensing and geolocation protection and would have to be substantially revised to compensate for the deletion of the sensing protections. Moreover, the compensating effects of such changes would be only partial, and, in the case of licensed microphones used for newsgathering and other mobile uses valued by the public, geolocation protection is not possible.

Respectfully submitted,

David Donovan
President

cc: Brad Gillen
Charles Mathias