

Lampert, O'Connor & Johnston, P.C.

1776 K Street NW, Suite 700
Washington, DC 20006

E. Ashton Johnston
johnston@lojlaw.com

tel (202) 887-6230
fax (202) 887-6231

September 16, 2010

Ex Parte via ECFS

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

Re: *Notice of Authorized Ex Parte Contact,*
ET Docket Nos. 04-186, 02-380, 10-24; WT Docket Nos. 08-166, 08-167

Dear Ms. Dortch:

On September 15, 2010, Richard S. Whitt, Washington Telecom and Media Counsel, Google Inc. ("Google"), Megan Anne Stull, Telecom Policy Counsel, Google, and the undersigned met with Louis Peraertz, Legal Advisor to Commissioner Clyburn, and on September 16, 2010, Mr. Whitt, Ms. Stull and I met separately with Rick Kaplan, Chief Counsel and Senior Legal Advisor to Chairman Genachowski and Jennifer Flynn, Legal Advisor to Chairman Genachowski; with John Giusti, Chief of Staff and Legal Advisor to Commissioner Copps; and with Charles Mathias, Legal Advisor to Commissioner Baker, concerning the TV white spaces proceeding.

At the meetings, Google thanked the various offices for moving ahead with efforts to open up the white spaces for new technologies and devices, and urged them to ensure that the final technical rules do not delay investment in and deployment of white space devices ("WSDs"). In particular, we expressed Google's support for eliminating the sensing requirement for geolocation-enabled WSDs, the need to ensure that no additional restrictions on WSD access to the TV white spaces are adopted, and the need to maintain a reasonable requirement for the frequency with which WSDs check the database. Google stressed that any requirement that devices check the database more frequently will increase the costs and complexity of both WSDs and database management and, moreover, the record does not support extending additional protections to wireless microphones, particularly given their access to reserve channels. Finally, we discussed Google's view that the Commission should not authorize any backhaul operations in the TV white spaces that would delay or negatively affect WSD deployment in the bands.

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Should you have any questions, please do not hesitate to contact me.

Respectfully submitted,



E. Ashton Johnston

cc: Rick Kaplan
Jennifer Flynn
John Giusti
Louis Peraertz
Charles Mathias