



January 24, 2011

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary

Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

RE: ET Docket No. 04-186 Unlicensed Operation in the TV Broadcast Bands

Ex Parte Presentation

Dear Ms. Dortch:

As a prospective TV Band White Space database administrator, Key Bridge has developed a robust and mature body of software technology plus methods and practices for the implementation of White Space administration. In this regard we share our colleagues at Spectrum Bridge's enthusiasm and desire for an expeditious and orderly implementation. However, we disagree with several claims Spectrum Bridge appears to have made during their recent visit with the Office of Engineering and Technology¹ and are concerned that, unanswered, they could create doubt at the Commission about the community's readiness. Specifically:

Mechanism to Validate Contour Generation

On slide 4 of their presentation Spectrum Bridge claims that the FCC must provide a "reference contour" and a "reference set of the 360 lat/long points to compare [ours] against."

This is presumably to validate their algorithms and we are puzzled by this request. The FCC already provides a contour calculation tool on its web site² and the calculation of new latitude and longitude coordinates from a fixed coordinate, heading and distance is a trivial and well-known mathematical technique.

Key Bridge respectfully submits that the FCC has sufficiently specified all methods and techniques and provided, directly or by reference, all data necessary for any database administrator to fully satisfy their technical requirements within 47 CFR Part 15, Subpart H.

Results will be Affected by Terrain Data

Also on slide 4 of their presentation Spectrum Bride claims that their results will be "affected by the terrain data we utilize." Our own analysis does not support this. Last summer our college intern studied the impact of different elevation data sets and showed to my satisfaction that any

¹ See Spectrum Bridge *EX PARTE* letter and *Presentation* in ET Docket 04-186 posted 01/20/11

² See *FM and TV Propagation Curves Calculations* at <http://www.fcc.gov/mb/audio/bickel/curves.html>



biases within a given elevation data are averaged out and create no impact on the calculation of geographic protected contours.³

Throughout this process the FCC has avoided over-specifying technologies that industry must use to implement the Commission's intent. There is no need for the Commission to specify any particular digital elevation model for the calculation of geographic protected contours.

Conclusion

While we acknowledge some of the concerns raised in the recent round of Petitions for Reconsideration we note that none of them concerned the operation of a White Space database. We also acknowledge that certain commercial policy remains to be settled within and among industry participants. Nevertheless, we feel, and believe the record supports, that no further technical specification, analysis, or study is required by the FCC as regards authorization of TV White Space administrators. Accordingly, Key Bridge encourages the Commission to proceed with Database authorization, testing and verification of compliance; seeding what is sure to be an exciting wave of wireless innovation.

Happy New Year and Best regards,

/s/

Jesse Caulfield, President

Key Bridge Global LLC

³ See *Herring - SRTM vs GLOBE DEM Analysis* which is attached for reference. Note that only the SRTM-3 (3 arc second) and GLOBE (30 arc second) data were analyzed and results may not be valid for other elevation data.