

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:

Unlicensed Operation in the TV Broadcast
Bands

ET Docket No. 04-186

**COMMENTS OF TELCORDIA TECHNOLOGIES
REGARDING PETITIONS FOR RECONSIDERATION OF THE SECOND MEMORANDUM
OPINION AND ORDER**

February 24, 2011

TELCORDIA TECHNOLOGIES, INC.
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INTRODUCTION

Telcordia Technologies, Inc. (hereafter Telcordia) herein responds to the five Petitions for Reconsideration¹ of the Second Report and Order in FCC 04-186. Telcordia as one of the conditionally designated TV Bands Database administrators is an interested party in this proceeding.

Telcordia has proposed a secure and flexible database design with a complete solution as one of multiple TV Band Device Database Managers. As discussed below the Telcordia solution can flexibly accommodate any rule changes that result from the various Petitions for Reconsideration.

ISSUE 1: OUT OF BAND EMISSIONS LIMITS FOR FIXED DEVICES

Several Petitioners raise the issue of the decreased out-of-band emission (OOBE) limits aka the spectral emission mask permitted under the new rules particularly for fixed devices². Those petitioners suggest amending the new rules to allow for an increased limit on emissions for fixed devices. While Telcordia takes no position on the suggested change itself, from a TV Bands Database administration perspective, Telcordia has

¹ Petition for Reconsideration, The Wi-Fi Alliance, 4 January 2011; Petition for Partial Reconsideration, Cellular South Inc., 5 January 2011; Petition for Reconsideration of Motorola Solutions Inc., 5 January 2011; Petition for Reconsideration, The National Cable & Telecommunications Association (NCTA), 5 January 2011; and Joint Petition for Partial Consideration, the Wireless Internet Providers Association, the Federation of Internet Solution Providers of the Americas, the Native American Broadband Association, Spectrum Bridge, Inc., Comsearch, Carlson Wireless Technologies, Inc., and Wireless Strategies Inc. (Collectively Joint Petitioners), 5 January 2011.

² See Joint Petitioners pp. 7-10; Motorola pp. 2-10; and WiFi Alliance pp. 2-3.

architected a solution that can easily accommodate changes to the rules affecting adjacent channel separation distances and/or an additional class of fixed TVBD with a relaxed spectral mask with rules requiring an increased adjacent channel separation distance, and Telcordia can implement the requested rules in its system should the FCC adopt this change.

ISSUE 2: DATABASE ACCESS

The National Cable & Telecommunications Association (NCTA) raises the issue of access by the general public to the location information of cable headends arguing that access to specific geographic location information available to the public presents a risk to critical communications infrastructure³. They suggest amending the rules to allow access only to service providers and manufacturers. While Telcordia takes no position on the suggested change itself, as a TV bands database administrator can restrict access to the data to specified user types as determined by the Commission or its Office of Engineering Technology (OET). In discussing the database access issue, NCTA additionally suggests non-specific limits on the use of the data in the TV Bands database limiting access solely to a list of channels⁴. If data access is limited to authorized users, limiting the data available solely to a list of channels is not necessary for the critical infrastructure security reasons to those authorized users. While the primary purpose of the data is clearly to determine appropriate available channels for white spaces TV bands devices (TVBDs), this should not limit other legitimate uses of the data provisioned in

³ NCTA pp. 3-7

⁴ NCTA p. 7.

the database where such use does not violate the Commission's rules. The data available to the public, if such remains permitted, could be limited to that data that is found to be necessary, non-proprietary and does not lead to such risks. In any case Telcordia as a TV Bands database administrator can implement rules in its system should the FCC adopt this or similar changes.

ISSUE 3: HEIGHT ABOVE AVERAGE TERRAIN (HAAT)

The Joint Petitioners suggest two primary changes to the new rules. First they suggest standardized use of HAAT for calculation rather than height above ground level (AGL). In addition they argue that the limit of 76m HAAT for transmit antenna heights be raise to 250m⁵. While Telcordia does not take a position on the specific issue, Telcordia as a TV bands database administrator can implement the requested rules in its system should the FCC adopt this change.

ISSUE 4: REGISTRATION OF LOWER 700 MHZ BASE STATIONS AND CHANNEL 51 PROTECTION

Cellular South argues that the Commission amend the rules to permit for registration of "Lower 700 Block A base stations" in the TV Bands database(s) and to prohibit fixed TVBD operation in TV Channel 51 and limit personal/personal TVBD operation on Channel 51. As with the issues above, while Telcordia takes no position on the issue itself, as a TV bands database administrator can implement the requested rules in its system should the FCC adopt this change.

⁵ Joint Petitioners, pp. 3-6.

CONCLUSION

Telcordia respectfully requests that the Commission or its Office of Engineering Technology rule on the instant Petitions with specific rules or guidance that are implementable by TV bands database administrators in a timely manner. Telcordia has built its system for testing by the OET in compliance with the current FCC rules, and while our flexible system can accommodate the suggested new rules in the Petitions, a reasonably small period of time will be needed to incorporate the rule changes for that result from any reconsideration as result of the petitions.

Respectfully submitted,

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