



December 1, 2011

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

Re: Notice of Ex Parte Communication, ET Docket No. 04-186

Dear Ms. Dortch:

On November 30, 2011, Bruce Franca and the undersigned of the National Association of Broadcasters (NAB) met with Julie Knapp, Alan Stillwell, Bruce Romano, Ira Keltz, Don Campbell, Hugh Van Tuyl and Karen Ansari of the Office of Engineering and Technology.

In the meeting, we discussed various issues in respect to the Commission's rules regarding the operation of unlicensed TV band devices ("TVBDs"). Specifically, we discussed the "Comments and Updates on Petitions for Reconsideration" filed by Spectrum Bridge Inc. in this proceeding on Sept. 14, 2011. In that filing, Spectrum Bridge proposed changes to TVBD rules adopted by the Commission in 2008 and modified in 2010. We stated in this meeting, as we did in a written *Ex Parte* communication filed in this proceeding on November 21st, that Spectrum Bridge's comments were effectively a late-filed petition for reconsideration, and, therefore, untimely. Moreover, we argued that the new changes sought by Spectrum Bridge would compromise critical protections for licensed services.

Finally, we briefly discussed Spectrum Bridge's 45-day trial and noted that we have recently discovered an error in the calculation of the two reserve channels for wireless microphones in the case where both reserve channels occur below TV channel 37. We also discussed the fact that a certain very limited number of TV stations may be operating under an STA and noted that the FCC should ensure that the database have some capability to protect those operating stations.

1771 N Street NW
Washington DC 20036 2800
Phone 202 429 5300

Marlene H. Dortch, Esq.
December 1, 2011

Respectfully submitted,

A handwritten signature in black ink that reads "Scott Goodwin". The signature is written in a cursive, flowing style.

Scott Goodwin
Associate General Counsel
Legal and Regulatory Affairs

Cc: Julie Knapp
Bruce Romano
Alan Stillwell
Ira Keltz
Don Campbell
Hugh Van Tuyl
Karen Asari