



July 16, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20544  
Via Electronic filing and USPS

Re: ET Docket No. 04-186; ET Docket No. 10-237; WT Docket No. 12-4

Dear Ms. Dortch,

Spectrum Bridge Inc. (SBI) is a provider of spectrum management and spectrum sharing solutions based on our Authorized Shared Access (ASA) platform. As you are aware, we were the first company to successfully complete FCC certification of a database platform for sharing TV White Space. We also provide a secondary market place for spectrum (SpecEx) as well as other spectrum sharing and spectrum management tools.

Recently there have been a number of public proposals to adopt a “use it or share it” approach to licensed build-out obligations. For example, the President’s Council of Advisors on Science and Technology (PCAST) recently presented a summary of recommendations advocating shared use of spectrum. Also, Michael Calabrese of the New America Foundation authored a paper entitled “Use it or Share it: Unlocking the Vast Wasteland of Fallow Spectrum” that presented an approach for authorizing and encouraging use of spectrum that would otherwise remain fallow. Spectrum Bridge believes that a “use it or share it” approach is much more acceptable than a “use it or lose it” approach.

Existing technologies, like our ASA platform, already enable a “use it or share it” approach. For example, license holders with underdeveloped networks could be required to make their unused spectrum available on a secondary basis until such time as they could build out and use the spectrum. The ASA platform supports both unlicensed, non-exclusive secondary use as well as exclusive, rented or leased, use.

The shared use of the unlicensed TV White Space is a good representation of the success of shared spectrum technology. Under FCC rules both broadcasters and licensed microphones have a right to protection once registered. The SBI TV White

Space solution provides user interfaces, audit mechanisms and public interfaces that permit protection by microphone users over a specific geography, frequency and time. The same mechanism, albeit without a time limit, could be used by a license holder in a “use it or share it” scenario.

Without taking a position on any specific proceeding we would like to encourage the “use it or share it” approach. As a company dedicated to finding and making spectrum available for the variety of applications and services we are all becoming accustomed to we see this as a logical solution without any technical challenges that have to be overcome.

SBI also believes that demand for wireless access and the associated spectrum will continue to grow and flexible approaches to serve that need and the new and innovative solutions we have yet to invent will be required to meet this demand. The next step is for the FCC to take the initiative to enable sharing.

Respectfully,

*/S/ Rodney D. Dir*

Rodney D. Dir  
President & CEO