

The Honorable Gordon H. Smith
President and CEO



May 10, 2013

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: *Expanding the Economic and Innovation Opportunities of Spectrum
Through Incentive Auctions, GN Docket No. 12-268*

Dear Mr. Chairman:

On behalf of the National Association of Broadcasters (NAB), I want to commend you and your staff for hosting a very successful public workshop May 3 concerning the technical aspects of the post-incentive auction 600 MHz band plan. As you are aware, NAB and a number of companies in and associated with the wireless industry have been working together to address many of the technical challenges associated with the upcoming incentive auction. That cooperative spirit was on display at the workshop, leading to what I believe to be at least three very significant accomplishments, each detailed below.

First, the workshop demonstrated unequivocal industry consensus for a "Channel 51 down" band plan rather than the 90 MHz "split" between uplink and downlink channels originally proposed in the Notice of Proposed Rulemaking (NPRM). As noted by many workshop participants, a Channel 51 down band plan facilitates wireless equipment and handset design and mitigates potential interference between wireless and broadcast operations. A great number of workshop participants expressed serious concerns regarding out of band interference (i.e., 3rd order intermodulation products) affecting both wireless and broadcast services under a split band regime.

Second, the workshop recognized the significant challenges and technical limitations associated with employing a variable band plan as a result of a market-by-market spectrum variation approach. Nokia Siemens Networks, for example, explained that under a market-by-market split-band regime, the Commission must require separation distances of 200 km or more (in some cases 300 or 400 km)

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between a broadcast transmitter and a base station receiver to avoid co-channel interference from high power broadcast transmitters to wireless base station receivers. Ericsson added that while some mitigation techniques could be applied to lessen the impact of this interference, the Commission should avoid as much as possible these situations by developing a national plan. The takeaway clearly was that more work needs to be done on this fundamental element of the auction.

Third, the workshop highlighted at least one area not addressed in the NPRM, namely the need to also consider interference *to* broadcast operations and television viewers *from* wireless operations. NAB and the Consumer Electronics Association both noted that while most of the NPRM and workshop discussion focused on avoiding interference from television to wireless operations, interference from wireless operations to television receivers warrants serious consideration.

Again, I want to applaud the Commission and its staff for hosting this workshop. The open and frank discussions and analysis fostered by the workshop will help improve the auction's chance for success. NAB looks forward to similar efforts on issues such as international coordination and repacking, and stands ready to lend our technical expertise to the Commission in these or related endeavors as we all work collectively towards an expeditious and fruitful incentive auction.

Sincerely,



Gordon H. Smith
President and CEO

cc: Incoming Acting Chairman Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Gary Epstein, Incentive Auction Task Force Chair
Ruth Milkman, Chief, Wireless Telecommunications Bureau
Julius Knapp, Chief, Office of Engineering and Technology