

INTERNATIONAL BROADCASTING NETWORK

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February 26, 2014

BY ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

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

Dear Ms. Dortch:

Further to our letter of yesterday, which focused on Artemis' new pCell technology, we are now submitting two articles recently published by *MIT Technology Review* concerning other technological advances that can also vastly increase wireless capacity without taking television spectrum.

One article features Intel's new ultra-high-speed wireless technology, which was demonstrated earlier this week at the Mobile World Congress conference in Barcelona, Spain. The other spotlights Rice University's *Argos* project, which has achieved enormous spectral capacity increases and power efficiency gains.

There can be no doubt whatsoever that the wireless industry's future lies in deploying technological advances, thereby massively increasing the data capacity of the spectrum it already has, rather than continuing to demand more spectrum to be used inefficiently.

It seems to us that Artemis' amazing pCell technology could be deployed more quickly, at lower cost and with greater benefit than any other proposed solution. However, that's a decision that should be made by the industry itself rather than by government.

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In no event should the federal government assign more spectrum to wireless companies as a reward for failing to efficiently use the spectrum they now have. And in no case should spectrum be taken from broadcasters and reassigned to wireless companies. To do so would be contrary to the public interest, without reasonable justification and counterproductive.

Accordingly, and for all the reasons expressed in International Broadcasting Network's previous filings, it is urged that the Commission terminate this proceeding and abandon its plans to reclaim and repurpose television spectrum.

Respectfully submitted,

Paul J. Broyles

Paul J. Broyles
President

Attachments