



WASHINGTON, DC

STEPHEN E. CORAN  
202.416.6744  
SCORAN@LERMANCENTER.COM

May 2, 2014

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

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

*Revisions to Rules Authorizing the Operation of Low Power Auxiliary Stations in the 698-806 MHz Band*, WT Docket No. 08-166

*Public Interest Spectrum Coalition, Petition for Rulemaking Regarding Low Power Auxiliary Stations, Including Wireless Microphones, and the Digital Television Transition*, WT Docket No. 08-167

*Amendment of Parts 15, 74 and 90 Of the Commission's Rules Regarding Low Power Auxiliary Stations, Including Wireless Microphones*, ET Docket No. 10-24

Notice of Oral Ex Parte Presentation

Dear Ms. Dortch:

On May 1, 2014, representatives of the Wireless Internet Service Providers Association ("WISPA") met with Erin McGrath, Legal Advisor to Commissioner Michael O'Rielly, to discuss issues related to the above-referenced proceedings. In addition to undersigned counsel, the WISPA representatives included Elizabeth Bowles, Chuck Hogg, Alex Phillips and Richard Harnish.

The discussion focused primarily on the TV white space spectrum that would be available for fixed unlicensed use after the auction and re-packing of TV stations. The WISPA representatives explained that, despite regulatory and legislative uncertainty and engineering challenges associated with developing equipment capable of communicating with the geolocation databases, American companies were successfully manufacturing, shipping, installing and deploying TV white space equipment in rural areas. The WISPA representatives emphasized the propagation benefits of sub-1 GHz spectrum for unlicensed use.

The WISPA representatives encouraged the Commission to adopt and implement re-packing rules and procedures that would optimize the amount and viability of contiguous spectrum for unlicensed fixed broadband service. The WISPA representatives noted the



Marlene H. Dortch, Secretary

May 2, 2014

Page 2

significant barriers resulting from the full six-megahertz of adjacent-channel protection each TV station has on both sides of its six-megahertz channel. WISPA reiterated its position demonstrating the spectrally efficient ways that remaining white space could be optimized to maximize the availability and utility of unlicensed spectrum for fixed broadband use.<sup>1</sup> These optimization methods include (a) allowing TV and LPTV stations to share channels where technically feasible, (b) identifying for LPTV displacement applications those channels that maximize the amount of the remaining spectrum for fixed unlicensed use, and (c) enforcing rules to prohibit database protection for LPTV stations that do not timely convert to digital operations or go dark for periods exceeding the time frames permitted by Commission rules.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-referenced proceedings.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Stephen E. Coran', with a long horizontal flourish extending to the right.

Stephen E. Coran

*Counsel to the Wireless Internet Service  
Providers Association*

cc: Erin McGrath

---

<sup>1</sup> See Comments of WISPA, Docket No. 12-268, *et al.* (filed Jan. 25, 2013) at 12-29.