June 18, 2015

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

Re: Notice of Oral Ex Parte Presentation
ET Docket No. 14-165 and GN Docket No. 12-268; RM-11745

Dear Ms. Dortch:

On June 16, 2015, Alex Phillips, Vice President and FCC Committee Chair for the Wireless Internet Service Providers Association (“WISPA”) and the undersigned met with Ira Keltz, Hugh Van Tuyl, Paul Murray and Aspasia Paroutsas of the FCC’s Office of Engineering and Technology met to discuss issues in the above-referenced proceedings regarding access to unlicensed use of TV band spectrum.

The WISPA representatives stated that ongoing regulatory uncertainty has raised concerns in the fixed broadband industry about the continuing availability of equipment and investment in white space deployment. We urged the Commission to move forward as quickly as possible to adopt rules in the subject proceeding that would provide regulatory certainty and increased flexibility consistent with many of the Commission’s proposals.

WISPA reiterated its support for adoption of rules that would enable the more flexible use of TV white space spectrum. In particular, we noted that there was little or no opposition in the record to (1) incorporating intermediate power and directional antennas into the TV white space database, and (2) permitting channel bonding and channel aggregation. We also urged the Commission to relax its conservative adjacent-channel restrictions to create more useable unlicensed spectrum.

WISPA noted its support for the Commission’s definition of “rural area,” which is based on the density of TV stations instead of population density or proximity from an urban area. For operations in rural areas, WISPA reiterated its request for higher power operations of up to 16 Watts EIRP and operations from higher elevations of up to 100 meters AGL and 500 meters

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HAAT to increase the coverage area and to reduce infrastructure costs. In cases where higher power and/or higher elevations were employed, WISPA agreed that there should be appropriate changes to the distance separation criteria to ensure incumbents remained protected from harmful interference.

WISPA indicated its objection, however, to the proposed rule that would reduce the database check interval from one time every 24 hours to one time every 20 minutes. WISPA explained that, in order for a narrow-band wireless microphone to experience any interference from a broadband white space device, the wireless microphone must be located within 300 meters of the broadband TVWS device and within the main beam of the broadband device antenna (based on (a) 6 MHz broadband channel, (b) 200 kHz wireless microphone channel, (c) 4 Watt broadband EIRP, (d) – 114 dBm wireless microphone receiver threshold, and (e) 400 MHz free space path loss). The likelihood of these conditions occurring simultaneously is very small. Therefore, the proposed rule that would allow a short-range wireless microphone to either force a channel change or force an entire broadband wide-area network off the air (if there is no other available channel) is extremely overprotective. As alternatives, WISPA suggested that the Commission might require databases to “push” information about wireless microphone use to white space devices if a frequency change is required. Another alternative would be to require less frequent database checks in rural areas because wireless microphone use would be much less prevalent there.

With respect to the definition of “commence operations,” WISPA reiterated its support for the Commission’s proposal to require 600 MHz licensees to provide notice to the Commission when it begins to transmit on its licensed spectrum in preparation for the launch of customer service within the ensuing 60-day period. To this proposal, WISPA has asked for additional rules that require 600 MHz licensees to submit to the Commission a polygonal depiction of base station deployment that establishes the planned area of operation. Further, operation of TV white space devices should be permitted to continue in the licensed market outside of the defined deployment area until such time as the 600 MHz licensee provides further notice of commencement of operations covering additional portions of its licensed market.

WISPA also discussed the pending emergency petition for rulemaking filed by the National Association of Broadcasters (“NAB”) regarding alleged anomalies in the database. WISPA encouraged the Commission to continue to work with the database administrators and to not adopt the relief that NAB requested. In particular, WISPA urged the Commission to retain the professional installation option for TV white space devices. WISPA also explained that it

3 See WISPA Part 15 Comments at 13-16.


was developing a professional installation certification program and would be submitting an outline of that program to the Commission in the near future.

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-captioned proceedings.

Respectfully submitted,

[Signature]

Stephen E. Coran
Counsel to WISPA

cc: Ira Keltz
    Hugh Van Tuyl
    Paul Murray
    Aspasia Paroutsas
    Alex Phillips