June 26, 2015

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

Re: Incentive Auction and TV White Spaces  
Oral Ex Parte Presentation

Dear Ms. Dortch:

On June 24, 2015, James Carlson, CEO of Carlson Wireless Technologies, Inc. (CWT) and Mark O’Connor, Board Member of CWT, met with Commissioner Michael O’Reilly and Erin McGrath, Commissioner O’Reilly’s legal advisor. We described our current progress on a Third Generation white spaces product that will deliver a significantly better feature set, including higher bandwidth, at a much lower price point, which should accelerate white spaces deployment in the U.S. and foreign markets. CWT also discussed its deployments in the U.S. and throughout the world. Currently, 300 CWT radios have been deployed in the U.S. and 1,200 have been deployed in foreign countries. Large customers serving rural America have also expressed interest in much greater orders for CWT white spaces radios following the upcoming FCC incentive auction. CWT emphasized the importance of commencing the incentive auction quickly and completing it smoothly in order for potential customers and investors to confirm the availability of white spaces with a higher degree of certainty.

Further, we described how CWT minimizes erroneous data entry into the white spaces databases by working with each of our customers’ professional installers to input all information correctly, how we review independently the database information to troubleshoot for possible errors and work closely with other white spaces manufacturers to correct swiftly the few errors that we identify. CWT has provided white spaces base stations and client radios to NAB and we continue to work with NAB on testing to continue to ensure no possible interference to TV broadcasters. CWT is ready to continue to work with NAB and other industry participants to resolve questions and concerns regarding the accuracy of white spaces database information.

Finally, we discussed the importance of adopting improvements to the white spaces rules -- such as increased power limits in rural areas, channel bonding, and HAAT flexibility in rural areas – that will encourage the deployment of white spaces technology to reach those millions of U.S. rural consumers
and businesses who cannot be served today by cable, fiber, DSL, or line-of-sight wireless broadband. We also noted the study recently submitted by Google regarding Channel 37 and WMTS exclusion zones, and agree with Google that a Longley-Rice interference approach should be used instead of the proposed approach, which grossly over-estimates actual interference and would limit white spaces deployment unnecessarily.

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,

/s/

James Carlson

cc: Commissioner Michael O’Reilly
    Erin McGrath