July 10, 2015

VIA ELECTRONIC FILING

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


Dear Ms. Dortch,

CTIA – The Wireless Association® (“CTIA”) recognizes the role played by wireless microphones in public events and news reports and continues to support efforts to identify appropriate spectrum bands for their use. As the Commission considers transitioning wireless microphones from licensed bands in the newly created 600 MHz band plan, CTIA encourages the Commission to remain focused on actions that will promote its long-term goals of flexible use and spectral efficiency. With these goals in mind, the Commission should be wary of proposals to allow wireless microphone use in bands that may present future opportunities for flexible, mobile broadband use.

As the Commission undertakes this effort, CTIA encourages the Commission to recognize the international efforts to study bands such as the 1435-1525 MHz band for commercial wireless services. To the extent the Commission does consider such bands, the Commission should resist calls to substantially increase the allocation to wireless microphone use. For example, granting wireless microphone access to the entire 1.4 GHz band would result in significant increase in the amount of spectrum beyond the capacity that may be lost in the 600 MHz band. In effect, such a proposal would replace capabilities present in the current regulations – twelve megahertz of spectrum capacity – with access to 90 megahertz. A policy result that replaces access to 12 megahertz with 90 megahertz is entirely inconsistent with the stated goals of the wireless microphone proceeding: (1) good spectrum management; and (2) improved spectral efficiency over time. Instead, CTIA suggests that the Commission focus its attention on the other spectrum bands proposed for wireless microphones and, at minimum, limit wireless microphone access in new spectrum bands to a similar amount of spectrum (twelve megahertz).

3 Id. at 43.
4 The Commission has reserved the first TV channel above and below TV 37 for wireless microphone use, precluding such use for television white space devices. See 47 C.F.R. §15.712(f) (“Low power auxiliary services, including wireless microphones: (1) Fixed TVBDs are not permitted to operate within 1 km, and personal/portable TVBDs will not be permitted to operate within 400 meters, of the coordinates of registered low power auxiliary station sites on the registered channels during the designated times they are used by low power auxiliary stations. (2) TVBDs are not permitted to operate on the first channel on each side of TV channel 37 (608-614 MHz) that is not occupied by a licensed service.”)
Pursuant to Section 1.1206 of the Commission’s rules, 47 C.F.R. § 1.1206, this letter is being electronically filed via ECFS. Please direct any questions to the undersigned.

Sincerely,

/s/ Scott K. Bergmann

Scott K. Bergmann
Vice President, Regulatory Affairs
CTIA-The Wireless Association®