



June 22, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Written Ex Parte Presentation
ET Docket No. 04-186; ET Docket No. 10-237; WT Docket No. 12-4; and
GN Docket No. 09-51

Dear Ms. Dortch:

Carlson Wireless Technologies, Inc. (“CWT”) is a communications equipment research, development and manufacturing company based in Arcata, California. CWT provides backhaul solutions for rural and Tribal areas, and is a leader in the production of 4.9 GHz equipment used by first responders. CWT is developing unlicensed TV white space equipment to be used for broadband, VPN and M2M solutions, among others.

Recently, there have been public proposals to adopt a “use it or share it” approach to licensed build-out obligations. For example, on May 25, 2012, the President’s Council of Advisors on Science and Technology (PCAST) presented a summary of recommendations advocating shared use of spectrum. Last fall, Michael A. Calabrese of the New America Foundation authored a white paper entitled “Use it or Share it: Unlocking the Vast Wasteland of Fallow Spectrum” that presented an approach for authorizing and encouraging use of spectrum that would otherwise remain fallow. Under this approach, where licensees do not meet their build-out obligations, the spectrum would become available to devices via a database similar to the geolocation database being used for TV white spaces. When the licensee builds out to the relevant area, it would alert the database administrator and the frequencies would no longer be available.

Existing technology enables devices to access spectrum dynamically. In other words, where a channel is occupied, or becomes occupied, a database would block other uses from using that channel for so long as the channel is occupied. The equipment CWT is designing and making for TV white spaces will have this capability to ensure that incumbent stations do not experience interference and to allow fallow spectrum to be used on an unlicensed basis.

Without taking a position in regard to the outcome of any specific proceeding, we wish to applaud the “use it or share it” approach. As a manufacturer developing products in this space, CWT sees no technical problems in adding additional frequencies to the database and providing frequency-specific rules to govern device use. The entire point of the white space technology is to enable precisely this kind of geographic-specific,



frequency-specific spectrum use in a way that is fully compatible with existing incumbent licensees.

CWT also believes that existing demand for wireless access ensures that demand for such flexible devices capable of opportunistic sharing will continue to grow over time. Eventually, we expect that white space chips capable of opportunistic sharing such as “use it or share it” will become as ubiquitous as WiFi chips in smartphones, and CWT plans to be part of this exciting development. All that is required is for the Commission to take the first step and make this sharing possible.

Respectfully submitted,

A handwritten signature in black ink that reads 'James R. Carlson'.

James Carlson, President