



LAND MOBILE COMMUNICATIONS COUNCIL

November 28, 2011

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

Re: ET Docket No. 04-186
Public Testing of Spectrum Bridge Inc.'s TV Bands Database System

Dear Madame Secretary:

The Land Mobile Communications Council (LMCC) is pleased to have this opportunity to respond to the Commission's invitation to comment in the above-referenced matter.¹ The LMCC has been an active participant in every FCC rule making proceeding that envisions the deployment of unlicensed devices within the spectrum now known as TV White Space. The LMCC's interest, of course, has been to ensure that business, industrial, critical infrastructure and mission critical incumbent licensees will have the opportunity to continue to provide very significant economic and social benefits to the American public through the use of their geographically limited, but essential, 470-512 MHz band (T-Band) systems. For example, the LMCC recently reminded the Commission that many of LMCC's members' constituents are intensive users of the 470-512 MHz band, and that such "operations are at least as essential to the public as is enhanced wireless broadband access."²

A review of Spectrum Bridge's TV Bands database by the LMCC indicates that it appears to adequately identify: (i) TV Band use by Private Land Mobile and Commercial Mobile Radio Service (PLMRS/CMRS) incumbents on channels originally allocated for such use within eleven defined markets; and (ii) extended T-Band use granted through waivers issued to PLMRS/CMRS licensees outside the original 80 kilometer radius of those eleven markets. Further clarification may be needed, however, to ensure that the database has taken into account the additional T-Band allocations that have been authorized by waiver for public safety licensees to accommodate their mission critical communication requirements in urban areas such as Los Angeles, California. We understand that the Office of Engineering and Technology (OET) is continuing its efforts to further refine criteria

¹ Office of Engineering and Technology Requests Comment on the Public Testing of Spectrum Bridge Inc.'s TV Bands Database System, ET Docket No. 04-186, *Public Notice*, DA 11-1872 (rel. Nov. 10, 2011).

² See Doug Aiken, President, LMCC letter to Chairman Genachowski dated July 7, 2011.

for incumbent protection from TV White Space devices and the LMCC supports that effort. As specific protection criteria continue to evolve for use by all ten TV White Space database providers, the LMCC will monitor these critical developments and will provide specific recommendations as necessary to assist the FCC's efforts to protect TV White Space incumbent operations.

Developing a database of protected facilities should not be overly challenging for the designated database providers. It will be more critical to conduct TV White Space product testing to confirm that unlicensed devices are capable of utilizing the data in order to automatically avoid the use of TV White Space spectrum in areas in which these PLMRS/CMRS systems are entitled to protection from interference. If helpful, the LMCC would be pleased to assist OET, database architects, and manufacturers of unlicensed White Space devices when actual tests are to be conducted that will verify automatic device access to and utilization of these databases for the purpose of avoiding the use of protected spectrum.

Sincerely,

Douglas M. Aiken

Douglas M. Aiken
President

cc: LMCC Membership