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Via Electronic Filing



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

Re: Comment Sought on Defining Commencement of Operations in the 600 MHz Band [GN Docket No. 12-268; FCC 15-38]

Dear Ms. Dortch,

The Dynamic Spectrum Alliance¹ (DSA) supports the Commission’s plan to allow fixed and personal/portable unlicensed devices to continue to use otherwise vacant spectrum in the repurposed 600 MHz band until a Part 27 600 MHz Band wireless licensee commences operations.

Essential to the success of the Commission’s plan are clear, concise, and workable definitions explaining what it means to “commence operations” and characterizing the area in which the operations have commenced. The Commission proposes that “operations commence” when a wireless licensee begins site activation and commissioning tests in the area served by the licensee’s commercial service infrastructure deployment². Based on this definition, the area in which the wireless licensee has commenced operations can be smaller than a licensed Partial Economic Area (PEA).

The DSA supports the Commission’s proposal and believes it advances the Commission’s transition objectives. Such an approach also ensures that a considerable amount of 600 MHz spectrum nationally will not lay fallow during the transition period and provides an additional incentive for a wireless licensee to build out its newly acquired spectrum.

Under the Commission’s proposed rules in FCC 14-144, a Part 27 600 MHz Band licensee must notify any certified TV bands database administrator of the date when it intends to commence operations in an area, what frequency or frequencies it intends to use, its call sign, and the area where it

¹ The Dynamic Spectrum Alliance is a global, cross-industry organization that includes multinational companies, small- and medium-sized enterprises, and academic, research, and other entities from around the world, all working to create innovative solutions that will increase the amount of available spectrum to the benefit of consumers and businesses alike. Further information and a full list of members are available at www.dynamicspectrumalliance.org.

² Comment Sought on Defining Commencement of Operations in the 600 MHz Band, FCC 15-38; Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions GN Docket No. 12-268; Notice of Proposed Rulemaking, ¶ 5-6 (2014).

will commence operations by a minimum of eight and a maximum of 120 coordinates³. This information would be used to ensure that fixed and personal portable white space devices accessing unused spectrum operate sufficiently far enough outside a Part 27 600 MHz Band licensee's service area to prevent harmful interference.

Accordingly, TV band database administrators will have to work with Part 27 600 MHz Band licensees to establish procedures for registering the location, operating frequencies, and start date for the area where a licensee has notified a database administration it intends to commence operations. The Commission should require Part 27 600 MHz band licensees to take all reasonable steps to assure the accuracy of the information and to provide the information to a TV bands database administrator with sufficient advance notice. Given the proposed definition of commence operations, Part 27 600 MHz licensees will have sufficient lead time to notify TV bands database administrators in advance of when testing begins. The notified TV band database administrator will then share this information with other TV band database administrators.

Using the Commission's proposed definitions for commence operations and the area in which the operations will commence makes it easier for the required co-channel and adjacent channel separation distances in the uplink and downlink bands to be calculated and any disputes regarding harmful interference to be resolved. The alternative approaches – defining the commencement of operations as any testing by a Part 27 600 MHz wireless licensee or a yet to be defined stage of testing – would create an unacceptably high risk that spectrum will remain unused for extended periods of time.

Similarly, the danger of considering the total license area or total area of a proposed phased deployment, rather than only where the Part 27 600 MHz has in place infrastructure for its site commissioning tests, is that there is no guarantee the licensee will complete the phased deployment in a timely manner. In such a situation, secondary and unlicensed users would be required to vacate the band even as spectrum remains unused. For these reasons, the DSA supports the Commission's proposed definition of commence operations and agrees that unlicensed use should be precluded only in the geographic areas where site activation and commissioning tests are actually taking place.

Respectfully submitted,



H. Nwana
Executive Director, Dynamic Spectrum Alliance

³ Amendment of Part 15 of the Commission's Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap, and Channel 37, and Amendment of Part 74 of the Commission's Rules for Low Power Auxiliary Stations in the Repurposed 600 MHz Band and 600 MHz Duplex Gap, ET Docket No. 14-165; Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions; GN Docket No. 12-268, Notice of Proposed Rulemaking, ¶ 177-181 (2014) [referred to at FCC 14-144].