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Via Electronic Filing

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

Re: Request to Amend Sections 47 C.F.R. 15.711(b) and 47 C.F.R. 15.717; Regarding Changes to Certain Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap and Channel 37, RM-11745

Dear Ms. Dortch:

The Dynamic Spectrum Alliance¹ (DSA) opposes the petition filed by the National Association of Broadcasters (NAB) in this proceeding, which requests that the FCC declare an “emergency” and shut down television white space (TVWS) databases. NAB attempts to create the impression that the databases aren’t working correctly. This assertion lacks merit. In fact, NAB has provided no evidence that any FCC requirement is not being met and did not cite a single instance of any harm to, or interference with, broadcast or other protected services.

There has been no interference and no injured broadcasters. NAB’s petition doesn’t allege that interference to broadcasting has occurred.

To promote competition, the FCC allows different companies to operate a database that protects TV broadcast and other protected services. Each database also lists the location of each fixed TVWS transmitter and contact information for the operator of that transmitter. The rules require database operators to make this information publicly available. NAB has stated that the public records for fixed device registrations are not identical across databases and some records appear to be test or dummy registrations.

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.

Neither of these issues should be cause for concern. As the NAB’s petition highlights, the databases currently include test entries that don’t represent actual or deployed radio equipment.² The presence of such test entries in databases does not affect radio operations and creates no risk whatsoever of harmful interference to incumbent operations. In fact, the testing in which dummy entries were created is designed to ensure and verify that essential communications between radio devices and the database remain compliant and reliable. NAB, therefore, entirely misses the point. Indeed, NAB actually accuses a manufacturer of “misusing the database” because the manufacturer clearly identified a record as being a test record.³ Further, contrary to NAB’s apparent belief, it is legal and reasonable for a single “owner” to register and be responsible for multiple devices.

The consistency of device registration data across databases similarly is not related to reliable database operations or device management. The databases share registration information to assist the FCC with enforcement actions and, in particular, to allow the FCC to capture the registration information by querying one database. The discrepancies identified by NAB⁴ can be attributed in part through the normal operational issues of live parallel systems while they are kept in sync, and they can be attributed to varying but equally permissible data retention practices across database providers. For example, different database operators may handle the retention of obsolete device registrations differently. Again, these discrepancies have no detrimental impact on incumbent protection.

Nor are the database entries open to tampering. The FCC requires that high-power base stations are professionally installed. These are enterprise-grade devices installed at fixed locations. As part of the installation process, devices are configured with location data and they register through a machine-to-machine process. It is reasonable for the FCC to assume that professional installers follow the rules, as there are potentially severe consequences for non-compliance.

Database providers, including DSA members, stand ready to work with the FCC to clarify data retention processes, but the minor discrepancies cited by NAB are not a bug

² National Association of Broadcasters’ Emergency Motion for Suspension of Operations and Petition For Rulemaking 9, *Request to Amend Sections 47 C.F.R. 15.711(b) and 47 C.F.R. 15.717; Regarding Changes to Certain Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap and Channel 37*, RM-11745 (filed Mar. 19, 2015).

³ *Id.* (“At one point, more than 80 devices listed ‘Meld test’ as the contact name”).

⁴ *See id.* at 26.”

at all. To avoid the sort of confusion NAB is trying to create, the FCC may wish to consider standardizing the policies for the databases to purge inactive transmitter records and possibly take further steps to clarify to broadcasters and others how the TVWS database works. Such changes, while possibly helpful in eliminating confusion for those using publicly available data, will not affect the possibility of harmful interference to licensed services, for NAB has not shown any such possibility. Accordingly, there is no need for the FCC to suspend database operations while it weighs housekeeping improvements.

Respectfully submitted,



H. Nwana

Executive Director,
Dynamic Spectrum Alliance