



ADVANCING GLOBAL COMMUNICATIONS

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October 5, 2007

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of Unlicensed Operation in the TV Broadcast Bands,*
ET Docket No. 04-186

Dear Ms. Dortch:

The Telecommunications Industry Association (“TIA”) commends the Commission for its efforts to introduce new low power devices in the vacant portions of the broadcast television spectrum bands (“white spaces”). TIA has 600 member companies that manufacture or supply the products and services used in global communications. Among their numerous lines of business, TIA member companies design and produce devices that are capable of operating in the white spaces.

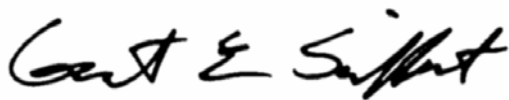
We strongly support the Commission’s desire to promote the more efficient use of spectrum and believe that proper use of the white spaces could have a particularly great impact on the growth of broadband services, especially in rural areas, where such vacant channels are readily available. Accordingly, the FCC, as an “expert agency,” should be permitted to make its decision based on robust testing and sound technical analysis.

The Commission is faced with the arduous task of balancing the benefits of using the white spaces with the need to protect authorized services in the TV bands from harmful interference. The Office of Engineering and Technology (“OET”) has therefore conducted an extensive testing program, including field testing, to assess the potential for interference from low power devices. We believe that OET is proceeding appropriately and should be permitted to continue with its testing, so long as the Commission, in consultation with its expert staff, deems further testing to be necessary in order to ensure that services operating in the TV spectrum are appropriately protected.

The proper handling of this decision could deliver greater broadband connectivity to consumers across the nation, while also ensuring that use of the white spaces will not cause harmful

interference to broadcast television and other authorized services. TIA therefore encourages the Commission to make its decision based strictly on sound technical analysis.

Sincerely,

A handwritten signature in black ink, appearing to read "Grant E. Seiffert". The signature is written in a cursive style with a large initial 'G' and 'S'.

Grant Seiffert
President