



February 27, 2008

Dear Member of Congress,

As members of the Wireless Innovation Alliance, we write to ensure that sound science at the Federal Communications Commission (FCC) is not compromised by outside interference.

As you may be aware, the FCC is exploring the possibility of freeing up vacant spectrum, called “white spaces”, for wireless broadband and other new technologies. The Wireless Innovation Alliance is a coalition of technology companies, industry organizations, consumer, education, civil rights, and other public interest advocates working to ensure that the full potential of TV white spaces is realized.

To ensure these technologies are sound and safe, the FCC has taken the extraordinary steps of employing four distinct phases of examination: (1) analysis of the engineering and policy questions; (2) testing to collect data about the technology, (3) establishing technical parameters that enable innovators to build commercial product devices; and (4) enforcing a strict certification process that ensures no commercial product will be manufactured or sold unless it complies with the FCC’s technical rules and avoids harmful interference.

Currently the FCC is completing the second of these phases, gathering data from four concept devices. We are hopeful the FCC will soon move to the next step and adopt technical parameters. Only then will innovators be able to build final commercial products and pass FCC certification, which is not likely to occur until the end of 2009. This is well after the FCC’s own determination that devices will not be certified until after digital television transition in February 2009.

FCC engineers have a long and noteworthy record of enabling the introduction of new technologies into the marketplace safely and effectively, and they will evaluate the white spaces opportunity using the same rigorous process.

Unfortunately, some entities are seeking to politicize the science behind the agency’s engineering work. The FCC’s science and examination process should not be compromised.

We urge Congress to continue allowing the FCC to collect the data it may need to build its engineering analysis - free from political interference. This is an engineering process that should be conducted by the FCC, the expert agency.

There is no question that utilizing these unoccupied frequencies will spur revolutionary advances in wireless devices and technologies for *all* Americans. Advances like mesh communications networks for public safety, affordable broadband access and, perhaps most notably, the deployment of wireless broadband will empower rural communities and schools across the country.

White Space devices will operate at very low power levels inside vacant TV spectrum, using technologies that will prevent harmful interference with other services and devices. Utilizing spectrum sensing technologies, which have been successfully implemented in U.S. military radar bands for years, white space devices will detect and avoid TV signals that are even 1/1000th as strong as a viewable TV signal so that they operate only in vacant channels and do not create harmful interference for TV signals or wireless microphone users.

As many of your colleagues in Congress and a majority of FCC Commissioners have repeatedly noted, the current examination process should be an engineering decision, not a political one. We hope you will join us in upholding the integrity of the FCC's engineering and the testing process. There is substantial unused public broadcast spectrum across the United States. That spectrum belongs to the public and it should serve the public good.

More information about the Wireless Innovation Alliance and this important issue can be found online at www.wirelessinnovationalliance.org. If you or your staff have further questions, please contact Michael Calabrese at 202-986-2700, or Brian Peters at 202-626-5736. Thank you for your consideration.

Sincerely,

The Wireless Innovation Alliance