

July 8, 2008

The Honorable Kevin Martin  
Chairman  
Federal Communications Commission  
445 Twelfth Street  
Washington, DC 20554

RE: OET

Dear Chairman Martin:

I understand the Federal Communications Commission is considering placing unlicensed transmitting devices in the television band on so-called "whitespace" channels. As you know, licensed wireless microphones used for news operations occupy these channels on a daily basis. Moreover, there is extensive use of these channels during large news events such as this summer's Republican and Democrat National Conventions.

Through the Network Pool, Republican and Democratic National Committees retained Broad Comm, Inc. to coordinate wireless microphone frequencies during these upcoming conventions for all the broadcasters. It takes us several months to coordinate all the frequencies for the committees and various domestic news outlets, TV, radio, print media, and others. The Political Conventions Communications Committee, (POLCOMM2008) is now assigning frequencies, creating a working database, and will even apply "certification labels" to broadcast transmitting equipment allowed on site.

We believe these conventions would provide a perfect opportunity to conduct further testing regarding the efficacy of these devices. The FCC's laboratory tests demonstrated that the proposed devices could not "sense" wireless microphones. More recently, several proponents suggested that wireless microphones employ "beacon technology" to avoid interference. Unfortunately, beacon technology has not been tested in the laboratory, much less the real world.

Due to potential interference concerns, we could not conduct the experiment during key convention times. Nonetheless, there would be time before each convention when we will be testing microphones. This would be a perfect time to conduct proper tests for either the "sensing" or the beacon approach currently debated in Washington. As chairman, I am sure that we will have the consensus of the entire POLCOMM2008 Committee for these important "beacon" tests.

We believe these experimental tests would provide valuable information for the FCC, broadcasters and the wireless industry. It would provide a real experiment during an event that employs hundreds of wireless microphones and frequencies.

Please let me know if the Commission is interested in conducting these important field tests. I would be more than happy to make the necessary arrangements for testing in Minneapolis or Denver, and we would be flexible regarding the testing logistics and details.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Libin". The signature is written in a cursive, flowing style.

Louis Libin  
President  
Broad-Comm, Inc.  
And  
Chairman  
POLCOMM2008