

**Before the**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**Washington, DC 20554**

In the Matter of )  
Unlicensed Operation in the TV Broadcast ) ET Docket No. 04-186  
Bands )

To: Secretary, Federal Communications Commission

**REPLY COMMENTS OF THE NATIONAL ASSOCIATION OF BROADCASTERS  
ON TEST OF SPECTRUM BRIDGE TV BANDS DATABASE**

The National Association of Broadcasters (“NAB”)<sup>1</sup> respectfully submits its Reply Comments concerning the public trial of the TV bands database system administered by Spectrum Bridge Inc. (“Spectrum Bridge”).

As NAB pointed out in its initial Comments, it is important to ensure that all of the functionality of any database system has been fully tested and is working correctly in all respects before the database goes live and devices are permitted to access it. We noted, for example, that additional testing periods need not be long and suggested that testing of the interaction with the still-to-be-developed FCC database for unlicensed wireless microphones could be done in a much shorter period (perhaps 15-20 days). It is also important that the issues that arose during the public trial of Spectrum Bridge's system are addressed.<sup>2</sup> NAB reiterates that it supports the roll-out of white space devices to consumers, and it does not wish to delay

<sup>1</sup> NAB is a nonprofit trade association that advocates on behalf of local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the Courts.

<sup>2</sup> These issues include a generally high incidence of tickets out of the total number of registrations; tickets on important issues (such as the inability to register protected operations); incomplete testing (*e.g.*, with respect to unlicensed wireless microphone registration); and the mid-stream implementation of (or commitments to implement in the future) various changes and improvements to the system.

this process. Yet, given the critical role that the TV bands database system will play in ensuring that primary, licensed operations—including the public’s free, over-the-air television service—are protected from destructive interference, it is essential to ensure that the database works properly before it is officially launched.

In its Comments, EIBASS expresses concern about protection for stations that have filed applications to cover built-out construction permits and are awaiting the issuance of licenses, and about stations that have filed applications for license renewals. In both cases, EIBASS asserts that these stations should be protected from unlicensed white space devices.<sup>3</sup> We agree. We urge the Commission to ensure that TV bands databases protect stations’ operating facilities, including in situations where, *e.g.*, such facilities have pending license/renewal applications or have current operations that are authorized by Special Temporary Authority.

EIBASS also points out that certain stations across the Canadian and Mexican border actually serve viewers in the United States, such as XETV, Tijuana, Mexico, which is the CW network affiliate serving San Diego. We agree that stations serving U.S. viewers should be protected from interference by unlicensed devices, even if they are located across the border.

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NAB will continue to work with the Commission and all stakeholders to ensure the successful completion of this critical database system.

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<sup>3</sup> Comments of EIBASS, ET Docket No. 04-186 (Nov. 28, 2011).

Respectfully submitted,

/s/

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