



January 10, 2008

Mr. David Rehr  
National Association of Broadcasters  
1771 N Street, NW  
Washington, D.C. 20036

Dear Mr. Rehr,

As the Federal Communications Commission begins prototype testing of unlicensed portable devices that will utilize vacant spectrum in the television broadcast bands, we urge you to let FCC engineers do their jobs free of undue outside interference. All parties should allow FCC engineers to perform tests that give maximum opportunity for new technologies.

Upcoming testing of white space concept devices is meant to assist FCC engineers to craft the strongest possible rules while ensuring maximum public benefit. Yet instead of respecting the FCC's desire to perform concept testing, your recent public misinformation campaign has confused the testing process and misled the public and policy-makers. As you are aware, the Commission's certification process ensures that no unlicensed device will be manufactured or sold unless it has been certified to comply with the Commission's technical rules.

We strongly hope that you will refrain from further politicizing a testing process that should be left to the FCC's expert engineers, and allow the FCC to craft rules of the road that will promote efficient use of white spaces spectrum, which lies fallow in as much as 75% in some areas of the country.

As numerous Members of Congress and FCC Commissioners have said, this should be an engineering decision, not a political one. We hope you will join us in respecting the integrity of the FCC's engineers and the testing process they pursue.

We are confident that the FCC will develop clear, reasonable rules that can unlock the incredible potential of vacant white spaces spectrum. Doing so will promote greater broadband connectivity and foster the development of innovative new wireless devices and technologies for *all* Americans.

The benefits of white spaces will only be realized, however, if the FCC is allowed to proceed with a fair, objective testing regime that is free from misleading attacks and misrepresentations.

Sincerely,

The Wireless Innovation Alliance