



October 4, 2007

Julius Knapp
Chief
Office of Engineering and Technology
445 12th Street, SW
Washington, DC 20554

Re: OET Testing of Unlicensed Devices; ET Docket No. 04-186

Dear Mr. Knapp:

Thank you for your telephone call on October 1, 2007, inviting MSTV to attend a meeting this Friday. You indicated that OET intends to conduct additional testing of White space devices. You further stated that the additional testing would be “transparent” and that Friday’s meeting will provide an opportunity to discuss the additional testing and the procedures to be used.

MSTV and the broadcast industry pledge to provide any resources needed to assist in these additional tests and to do so in a collaborative manner.

In order to facilitate full and meaningful discussion at Friday’s meeting, along the lines you indicated in our telephone conversation, we requested that you provide MSTV with a copy of OET’s proposed test plan prior to the meeting. If that is not possible, and in order for MSTV, the broadcast industry, and other participants to provide useful comments and ensure that adequate and appropriate resources are designated for this test program, we believe that at the Friday meeting OET should provide additional answers to the following questions:

- What are the purpose and objectives of these new additional tests?
- What types of devices will be tested?
- How many devices will be tested?
- Will these new tests include a broader number of locations than the earlier OET tests?
- Will the devices be representative of devices that will be manufactured?
- Will the devices be required to have the capability to communicate with other devices?

- Will the transmitter be required to have a filter that operates across all channels and meets the out-of-band limits proposed by the White Spaces Coalition?
- Will the interference characteristics of the devices be tested, and how?
- Will such interference testing be done in the laboratory, in the field, or both?
- Have parties other than Microsoft and Philips been asked to provide devices?
- What evaluation criteria will be used for these tests?
- Will collaborative sensing be tested?
- If so, is collaborative sensing intended to increase reliability or to reduce the sensing threshold level?
- In the event that devices in the new tests are found to meet manufacturers' suggested performance levels, will further testing be done to determine the proper sensing threshold necessary for protection of TV viewers?

The list of questions above is not complete, but we believe that it is a first and important step in ensuring transparency and participation by interested party in this process.

Respectfully submitted,

/s/ Victor Tawil and Bruce Franca

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