

Mr. Reuben Braddock  
Ofcom Spectrum Policy Group  
Riverside House  
2A Southwark Bridge Road  
London SE1 9HA  
United Kingdom

Dear Mr. Braddock:

The Dynamic Spectrum Alliance<sup>1</sup> supports the adoption of regulations allowing the use of license-exempt wireless devices in the vacant channels of the television broadcast bands (television white spaces, or TVWS).<sup>2</sup> A number of DSA members, including 6Harmonics, Adaptrum, the Centre for White Space Communications at the University of Strathclyde, Google, MediaTek, Microsoft, InterDigital, Japan's National Institute of Information and Communications Technology, and Spectrum Bridge, participated in Ofcom's pilot testing of TVWS technology,<sup>3</sup> and members look forward to continued collaboration with Ofcom in bringing TVWS services to the U.K. market.

As Ofcom has recognized, license-exempt use of television white spaces by wireless devices furthers important spectrum policy goals, including improving spectrum utilization,<sup>4</sup> expanding and improving the reach of wireless broadband,<sup>5</sup> and promoting innovation in wireless technologies.<sup>6</sup> Moreover, through the use of geolocation databases, these devices can operate without causing harmful interference to protected entities.<sup>7</sup>

The proposed regulations represent another critical milestone in bringing the potential of TVWS technology to the citizens of the U.K. We urge Ofcom to adopt the regulations without delay.

Respectfully submitted,



H. Nwana  
Executive Director

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<sup>1</sup> The Dynamic Spectrum Alliance is a global, cross-industry alliance focused on increasing dynamic access to unused radio frequencies. The membership spans multinational companies, small-and-medium-sized enterprises, academic, research, and other organizations from around the world, all working to create innovative solutions that will increase the utilization of available spectrum to the benefit of consumers and businesses alike. A full list of members is available at [www.dynamicspectrumalliance.org/members.html](http://www.dynamicspectrumalliance.org/members.html).

<sup>2</sup> Ofcom, *Notice of Proposals to Make the Wireless Telegraphy (White Space Devices) (Exemption) Regulations 2015*, Consultation (Nov. 6, 2015) (Consultation).

<sup>3</sup> See Ofcom, *Implementing TV White Spaces*, Statement (Feb. 12, 2015).

<sup>4</sup> *Id.* at 10.

<sup>5</sup> Consultation at 4.

<sup>6</sup> *Id.* at 5.

<sup>7</sup> *Id.* at 5.