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Hope this proves
useful to the FCC and the
congressional Commerce Committee
leaders.

Best,
Jim

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A "Fubar" Waiting To Happen

Using "white space" could cause devastating TV interference **By James H. Quello**

For a World War II veteran who survived seven amphibious landings, military lingo is a natural part of my lexicon. And as a longtime FCC commissioner and former broadcaster, I sense a "fubar" from a long way off.

In case you don't know, "fubar" is a military expression meaning "Fouled Up Beyond All Recognition" (in the cleaned-up version).

Exactly what is causing this turmoil?

The alarming communications issue is the current proposal requiring the FCC to authorize all varieties of unlicensed devices, from wireless laptops to radio-controlled toys, on spectrum that was once reserved for television.

In case you've missed this highly technical argument, the FCC is proposing to open up the spectrum space between TV channels—that is, the "white space"—for use by next-generation wireless devices. This debate is not going to make headlines in newspapers, but I believe it will certainly cause headaches for broadcasters if it happens.

The unlicensed approach was originally intended to make spectrum available for new rural broadband services. Certainly, rural America deserves a choice in such services, and wireless broadband will help reach remote areas. But there is spectrum available in rural areas that, with proper planning, can be utilized for broadband services without harming consumers' digital reception.

Unfortunately, the proponents of unlicensed devices have ventured way beyond providing rural broadband services. They propose to use the unlicensed approach for "in-home" personal and portable consumer products in large and middle-size markets. That will cause, well, television fubar. Digital-TV reception and broadcast's conversion to digital will be threatened.

I respect the technical expertise of Silicon Valley, but I would require definite substantiation of their claim that they can place unlicensed transmitting devices on vacant TV frequencies without causing interference to TV sets.

A key problem is the location of these unlicensed devices relative to a consumer's TV set. Even a low-power device can interfere with a TV set if it is located close enough: A neighbor in the next apartment or down the street may cause your new digital TV set or subsidized converter box to freeze up.

Unlike the old analog system, in which interference was just some wavy

lines, interference to digital signals makes the picture totally unwatchable. It locks up, and the sound goes off. People using these unlicensed devices will not realize they are causing a problem. TV watchers suddenly deprived of television will wonder why the government's new digital converter box doesn't work.

Astute House Energy and Commerce Committee Chairman John Dingell (D-Mich.) registered his warning about the potential impediments to overall digital-TV transaction. He was quoted in the press: "I think careful oversight is going to be very much needed, because I have great apprehension that a fine mess lies before us."

I agree. In a more perfect, logical world, the government should first finalize the DTV transition before activating auctions or before validating unlicensed devices.

There is a great burden of proof on

industries seeking free spectrum and proposing unlicensed devices in larger and midsize markets throughout the nation. Why not consider requiring that these devices go through pre-testing. In fact, why not license them?

Over the next few years, consumers will spend billions of dollars on new digital TV sets. Congress has allocated \$1.5 billion to subsidize new digital-to-analog converter boxes. Unfortunately, the interference by this white-space problem could create a fiasco.

The DTV transition will probably be the most difficult consumer challenge since the beginning of television. It should be finalized before the TV band is opened to potentially devastating interference.

Final note: The most vital usage of information spectrum for consumers remains two of the very first wireless communication entities: radio in the 1920s and television later. Broadcasters remain the prime and often exclusive originators and providers of emergency warnings, local news, information and community civic integration. Let's not lose the picture. The digital transition doesn't have to end up as the FCC's coast-to-coast fubar. ■

Quello, 91, was an FCC commissioner for 23½ years and a broadcaster for 27 years. He is chairman/founder of the Quello Telecommunications Center for Management and Law at Michigan State University. He is also an independent contractor for Washington communications-law firm Wiley Rein LLP.

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COMMENTARY

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