

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:)	
)	
Termination of Dormant Proceedings)	CG Docket No. 20-158
)	
Amendment of Parts 15, 73 and 74 of the Commission's Rules to Provide for the Preservation of One Vacant Channel in the UHF Television Band For Use By White Space Devices And Wireless Microphones)	MB Docket No. 15-146

**REPLY COMMENTS OF
THE NATIONAL ASSOCIATION OF BROADCASTERS**

I. INTRODUCTION AND SUMMARY

The National Association of Broadcasters (NAB)¹ urges the Commission to close its long-dormant proceeding regarding the preservation of a “vacant” channel in the television band for use by TV White Space (TVWS) devices and wireless microphones.²

Closure of this docket is long overdue. Initial comments were filed on September 30, 2015, and reply comments were filed on October 30, 2015. The broadcast television spectrum incentive auction, which was the genesis of the proposal, closed over three years ago, and the repacking of television stations following the auction is nearing completion.

¹ The National Association of Broadcasters (NAB) is the nonprofit trade association that advocates on behalf of free local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² *Consumer and Governmental Affairs Bureau Seeks Comment on Termination of Certain Proceedings as Dormant*, Public Notice, 35 FCC Rcd 5525 (2020).

Indeed, the only new fact before the Commission in *years* in this proceeding is the reduction of available channels due to the incentive auction and repack.

Only four parties filed comments opposing the closure of this proceeding: Sennheiser Electronic Corporation; Shure Incorporated; Lectrosonics, Inc.; and Edgar C. Reihl, P.E. As an initial matter, the actions of each of these parties only confirms the fact that this proceeding has long since exceeded its useful lifespan. According to the Commission's Electronic Comment Filing System, Sennheiser last filed a document in this proceeding on March 28, 2018, well over two years ago. Shure last filed in this proceeding on September 30, 2015. Neither Lectrosonics nor Mr. Reihl has *ever* previously submitted a filing in this docket.

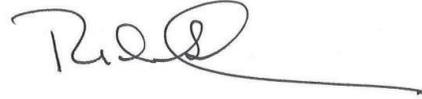
Moreover, none of these parties raises any new issue or presents any new information that warrants further prolonging this already overextended proceeding. Instead, they simply repeat arguments long since presented to the Commission during the original comment cycle apparently in an effort to continue to drag out this matter. Those arguments essentially boil down to the unsustainable position that both licensed and unlicensed wireless microphones should be protected from interference from unlicensed TVWS devices and should also be treated as primary over licensed broadcast television services in at least one channel in every market. Neither age nor the absence of attention from its proponents has made this argument more persuasive.

In short, there is no reason to continue to dedicate Commission resources to this long dormant proceeding. We urge the Commission to disregard as moot comments seeking to prolong the inevitable, and to promptly close this docket.

Respectfully submitted,

**NATIONAL ASSOCIATION OF
BROADCASTERS**

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A handwritten signature in black ink, appearing to read "Rick Kaplan", with a long horizontal flourish extending to the right.

Rick Kaplan
Patrick McFadden
Alison Neplokh
Robert Weller

August 20, 2020