March 22, 2011

The Honorable Jay Rockefeller IV  
United States Senate  
Senate Committee on Commerce,  
Science & Transportation

The Honorable Kay Bailey Hutchison  
United States Senate  
Senate Committee on Commerce,  
Science & Transportation

The Honorable Fred Upton  
U.S. House of Representatives  
House Committee on Energy & Commerce

The Honorable Henry Waxman  
U.S. House of Representatives  
House Committee on Energy & Commerce

Dear Chairman Rockefeller and Upton and Ranking Member Waxman and Hutchison,

I would like to direct your attention to a story that appeared in the March 16 edition of Communications Daily in which the past and current Chief of the FCC’s Office of Engineering and Technology expressed support for addressing receiver performance standards as an important tool to facilitate more efficient spectrum use.

With Congress, the White House, and the FCC moving forward to address future capacity shortages for mobile broadband services, broadcasters support taking a comprehensive approach that incorporates solutions from all industry stakeholders to achieve the most efficient overall telecommunications system. While reallocating airwaves to wireless carriers may accomplish some goals, technological improvements can and should be utilized by current wireless licensees to ensure the most efficient use of spectrum.

As you may know, interference experienced in receivers is determined both by the characteristics of RF transmission systems and the ability of receivers to reject unwanted signals, i.e., their interference immunity. Poor RF performance quality of wireless receivers thus can contribute to a capacity crunch for wireless services just as significantly as inadequate spectrum supply. We are encouraged by the views of the two FCC experts supporting reexamining receiver standards for all RF services from a perspective of maximizing spectrum efficiency, and encourage federal officials to team with manufacturers to find a solution that alleviates wasteful network congestion.

In closing, broadcasters look forward to working with other spectrum stakeholders in exploring all options that strengthen our telecommunications future, while not harming broadcasting and its ability to serve the 43 million Americans who rely exclusively on over-the-air television to stay connected to their communities.

Best regards,

Gordon H. Smith

Advocacy Education Innovation