

INFOCOMM INTERNATIONAL STATEMENT TO THE FEDERAL COMMUNICATIONS COMMISSION ON RULEMAKING 04-186

InfoComm International, the trade association representing the professional audiovisual industry, is concerned about the negative impact of potential FCC changes to the UHF television band on “white spaces” and the commercial audiovisual industry. InfoComm International represents 5,000 members, including audiovisual manufacturers, live event professionals, systems integrators and audiovisual system end-users.

Wireless devices can cause catastrophic interference if operated on the same frequency as wireless audio devices. The effect on a wireless microphone could be decreased range (perhaps to as little as 10 feet), an increase in the number and severity of audio dropouts, or even complete interruption of the signal. Tests have also proven that White Space devices can interfere with DTV reception and cable TV signals.

InfoComm proposes that in each market the FCC set aside eight ‘protected’ TV channels (2 in the VHF band and 6 in the UHF band), in which unlicensed wireless microphones could operate without interference from White Space devices. The devices would check an online database and avoid transmitting on the channels that are ‘protected’. InfoComm is concerned that FCC plans to set aside only two TV channels for unlicensed wireless mics is insufficient. Two TV channels (12 MHz of spectrum) would only be enough for four to ten wireless microphones – less if other wireless mic users are nearby. This is insufficient for many users.

InfoComm is also concerned that the FCC proposal relies on “spectrum sensing” technology for wireless microphones operating outside of the two ‘protected’ channels. This would require White Space devices to detect DTV stations and wireless audio equipment, and avoid transmitting on the frequencies that they are using. However, the FCC’s own tests have demonstrated that this technology often fails to detect that a wireless microphone is present, even at very short distances. What is the purpose of the Commission conducting tests if the Commission’s decision fails to take test results into consideration?

In situations where many wireless audio devices are in use, several open TV channels may be required. InfoComm is concerned about the operation of the online database for events and locations. The Commission has proposed that users register in an online database that would include the event location and duration, but who will have access to this database? This has not been decided and it is possible that many types of wireless users could be locked out.

InfoComm International urges the Federal Communications Commission to consider the far-reaching potential catastrophic ramifications of this rulemaking and make appropriate adjustments.