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June 30, 2004

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: **NOTICE OF *EX PARTE* MEETING**
ET Docket No. 04-186

Unlicensed Operation into the TV Broadcast Bands

Dear Ms. Dortch:

On June 29, 2004, an *ex parte* meeting was held in the above-captioned docket between representatives of Shure, Inc. ("Shure") and the staff of the Commission's Office of Engineering and Technology.[1] In attendance were, from Shure, Inc., Ahren Hartman, Principal Engineer, Advanced Development, Edgar Reihl, P.E., Principal Enginner, Advanced Development, Sandy Schroeder, Director, Corporate Market Development, Catherine Wang of Swidler Berlin Shereff Friedman, outside counsel to Shure, and from the Office of Engineering and Technology Alan Stilwell, Ron Repasi, Donald Campbell, Karen Rackley and Hugh Van Tuyl.

During this meeting, we discussed how unlicensed device operation in the TV bands as proposed in this proceeding presents significant potential harmful interference to wireless microphones and similar audio products. Absent meaningful interference mitigation requirements, such interference could affect the many important productions and activities that rely on such high-quality wireless audio products, including for example, larges houses of worship, sporting events, news coverage, TV and music productions. We discussed the parameters of Shure's interference study of the impact that unlicensed device operations in the TV bands will have on wireless microphones and the conclusions drawn from that data. To that end, we performed an audio demonstration that illustrated the harmful interference that

[1] Due to difficulties in computer transmission, this *ex parte* notice is being filed one-day late. Accordingly, permission to file this *ex parte* notice one day late is respectfully requested.

unlicensed devices cause to wireless microphones. Shure's analysis demonstrates that the introduction of unlicensed devices in the TV bands, as currently proposed, will likely cause harmful interference to wireless microphones, contrary to the Commission's stated belief in paragraph 38 of the Notice of Proposed Rulemaking in this docket.

Shure has studied several possible solutions that could, if developed and properly implemented, provide meaningful interference protection to wireless microphones in the event that the Commission determines in this proceeding that unlicensed devices should be allowed to operate in vacant TV channels. In light of the varied uses of wireless microphones in the United States, Shure discussed its support for a combination of approaches that would provide adequate protection to wireless microphones. This approach entails (1) a designation of some number of UHF and VHF channels where unlicensed devices will not operate, and (2) a wireless LAN ID solution wherein an unlicensed device will be able detect an operating wireless microphone.

Attached is our written summary of the discussion provided to Commission staff.

If you have any questions regarding this meeting, please do not hesitate to contact the undersigned.

Very truly yours,

Catherine Wang

cc (by email): Alan Stilwell
Ron Repasi
Donald Campbell
Karen Rackley
Hugh Van Tuyl