

**STATEMENT OF  
COMMISSIONER MICHAEL J. COPPS**

Re: *Innovation in the Broadcast Television Bands: Allocations, Channel Sharing and Improvements to VHF*, ET Docket No. 10-xx, Notice of Proposed Rulemaking.

I approach today's Notice with cautious optimism as we begin to contemplate spectrum innovation and how to make the best use of the spectrum we have. I agree that we need to act in a forward-looking manner to realize the tremendous promise of wireless broadband. There are a number of ways to help accomplish this, but we are going to be called upon to think really creatively—and outside the proverbial box—in order to make it a success. I think of this item as contingency planning for the better allocation of spectrum, and that applies to the concept of channel sharing. We don't yet know whether legislative action or economic conditions will allow for implementation of the full range of spectrum recommendations put forth in the National Broadband Plan, but we do know that we need to be smarter about spectrum utilization and that we need to maximize spectrum performance so that it may better serve the many communications needs of the American people.

I am, of course, mightily interested in the future of broadcasting. At the outset, I commend the Notice's recognition of the public value that free-to-all, over-the-air television can bring to American citizens. Many broadcasters have worked hard to turn this value into reality. I believe in the power of broadcasting and the potential for broadcasters to not only survive, but to thrive, if they will but recognize their strengths and the advantages that localism and the public-spirited administration of the airwaves bring to them. It's an advantage that not all—in fact, not nearly enough—broadcasters have pursued. It is no secret that I have been disappointed that so much of the spectrum dividend that accrued to broadcasters as a result of the DTV transition goes dramatically under-utilized. I am not interested in pushing broadcasters somewhere else or in discouraging their enhanced public interest stewardship of the airwaves. But public interest multi-casting remains, all too often, a concept—not a reality. I speak only for myself in saying that had this spectrum been put to such positive use, I would have little interest in contemplating other uses of it. But here we are, trying to divine how scarce and sometimes under-utilized spectrum can best serve consumers and citizens. Between now and such time as channel sharing and incentive auctions and all the rest come our way, maybe more broadcasters will come to see the wisdom of harvesting greater public benefits from the spectrum they are licensed to use.

One of the greatest challenges facing us, as we work to identify spectrum for wireless broadband and other uses, is to make sure that we have a comprehensive understanding of the current spectrum landscape. Surely our future success will depend not only on an understanding of our current spectrum allocations and assignments, but also on its actual use. That's why I am so glad that we continue to make progress on our Spectrum Dashboard—which will require ongoing commitment and resources to achieve its full potential. I know from my experience during the Digital TV transition that major changes in spectrum use can raise many issues, some unforeseen, and require concerted outreach to, and work with, consumers and industry. Consumers generally don't concern themselves much about the arcane details of spectrum allocation, nor should they have to, but they do rightly care that when they turn on a TV or make a call on a smart-phone, it works. And so we must begin a balancing act, weighing the needs and requirements of today and tomorrow.

I am pleased that we ask some difficult questions in this Notice. We need to understand the regulatory framework under which channel sharing would be allowed, the technical implications for broadcasters and viewers, and how any changes would affect over-the-air

broadcasting. We also examine ways to improve TV reception in the VHF spectrum. This latter won't be easy, believe me—we looked everywhere we could during the DTV transition, and real remedies were few and far between. Let's hope the months ahead lead us to some genuine innovation.

We do seem to have a consensus that some considerable new amount of spectrum will be required in the wireless world. Without additional spectrum, wireless consumers could face degraded service and/or higher prices. This concerns me. But it also concerns me that—without other safeguards—auctioning off massive amounts of spectrum to incumbent wireless providers may not necessarily result in more consumer-friendly pricing and service. Additional spectrum is, to be sure, an important part of the wireless solution. The whole solution it isn't. I suppose that's the difference between physical spectrum and spectrum policy.

So, this is a good and necessary item. We are teeing up questions that need to be answered, and if there are questions we don't ask, I hope commenters will answer them anyhow. We'll all pay attention! Thank you to Julie Knapp and the team at the Office of Engineering and Technology for the thorough job they did on a very complicated item. Their work continues to amaze me.