

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Amendment to Commission Rules Concerning) RM-11750
Adjudication of Spectrum Interference Disputes)

To: Chief, Wireless Telecommunications Bureau
Chief, Public Safety and Homeland Security Bureau
Chief, Enforcement Bureau

**COMMENTS
OF THE
ENTERPRISE WIRELESS ALLIANCE**

The Enterprise Wireless Alliance (“EWA” or “Alliance”), in accordance with Section 1.405 of the Federal Communications Commission (“FCC” or “Commission”) rules, hereby submits its Comments on the May 8, 2015 Petition for Rulemaking (“Petition”) filed by Samuelson-Glushko Technology Law & Policy Clinic (“TLPC”). The Petition asks the FCC to “provide an alternative mechanism for private parties to resolve their [spectrum interference] disputes that is fact-based, transparent, and timely....”¹ Specifically, the TLPC recommends that the rules be modified to permit private parties to submit interference complaints against one another directly to the Office of the Administrative Law Judges (“ALJ Office”), an option that currently is available to, but rarely used by, the FCC for addressing such matters. The Petition also proposes that deadlines be added to this ALJ adjudication process and that the ALJ Office be given the resources needed to handle these additional responsibilities.

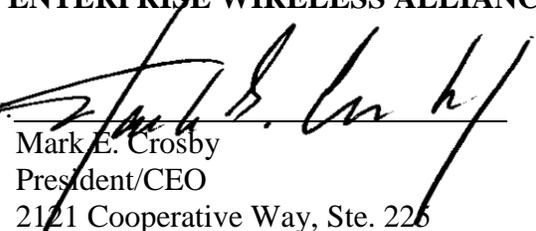
The Alliance agrees with the TLPC that the escalating use of spectrum in our increasingly untethered world is likely to increase instances of interference between users. EWA also agrees

¹ Petition at 1.

that the current process for resolving interference problems is not entirely predictable either in terms of timing or outcome. Particularly in light of the Commission's proposed reduction in Field Office staffing, it may be prudent to consider adding an interference resolution option such as that proposed in the Petition. While the Alliance is not certain that the ALJ Office is the optimal locus for that activity, which tends to be heavily dependent on evaluating competing technical claims rather than assessing legal rights, it nonetheless encourages the Commission to develop a record based on the proposal in the Petition, as well as alternatives that the FCC itself or other parties might consider even better suited to the task.

Respectfully submitted,

ENTERPRISE WIRELESS ALLIANCE

By: 

Mark E. Crosby
President/CEO
2121 Cooperative Way, Ste. 226
Herndon, VA 20171
(703) 528-5115
mark.crosby@enterprisewireless.org

Counsel:

Elizabeth R. Sachs
Lukas, Nace, Gutierrez & Sachs, LLP
8300 Greensboro Drive, Ste. 1200
McLean, VA 22102
(703) 584-8678
lsachs@fcclaw.com

July 13, 2015

Your submission has been accepted

ECFS Filing Receipt -	
Confirmation number: 2015713972062	
Proceeding	
Name	Subject
RM- 11750	CONSUMER & GOVERNMENTAL AFFAIRS BUREAU REFERENCE INFORMATION CENTER PETITION FOR RULEMAKING FILED
Contact Info	
Name of Filer: Enterprise Wireless Alliance	
Email Address: lsachs@fcclaw.com	
Attorney/Author Name: Elizabeth R. Sachs	
Lawfirm Name (required if represented by counsel): Lukas, Nace, Gutierrez & Sachs, LLP	
Address	
Address For: Law Firm	
Address Line 1: 8300 Greensboro Dr.	
Address Line 2: Ste. 1200	
City: McLean	
State: VIRGINIA	
Zip: 22102	
Details	
Type of Filing: COMMENT	
Document(s)	
File Name	Custom DescriptionSize
EWA Comments re TLPC Interference	30
Dispute PFR.pdf	KB
Disclaimer	
<p>This confirmation verifies that ECFS has received and accepted your filing. However, your filing will be rejected by ECFS if it contains macros, passwords, redlining, read-only formatting, a virus, or automated links to other documents.</p> <p>Filings are generally processed and made available for online viewing within one business day of receipt. You may use the link below to check on the status of your filing:</p> <p>http://apps.fcc.gov/ecfs/comment/confirm?confirmation=2015713972062</p> <p>For any problems please contact the Help Desk at 202-418-0193.</p>	