

**SEPARATE STATEMENT OF
COMMISSIONER MICHAEL J. COPPS**

Re: Establishment of an Interference Temperature Metric to Quantify and Manage Interference to Expand Available Unlicensed operation in Certain Fixed, Mobile and Satellite Frequency Bands; ET Docket No. 03-237.

I'm excited to see the beginning of the examination of whether we can put the spectrum temperature concept into practice. As I've said before, I think that the idea has great promise, if we use it as a tool to increase the efficiency with which spectrum resources are put to use, as is our statutory responsibility.

I hope that commenters will use the NOI to address an issue that is of particular concern to me. While the interference temperature metric may be a good new way to measure interference, we do not have an adequate way to determine what the right interference temperature is for a given band. The only tools we have for this job are the ill-fitting and ill-defined "interference" and "harmful interference" concepts. The inappropriateness and inadequacy of these concepts for the job of prospectively setting interference temperature will make this new metric very hard to use predictably and non-arbitrarily in the real world.

So I think that the Commission must work to improve the standard we use to determine permissible levels of interference, whether using the interference temperature metric or some other metric. And I believe that an important side benefit of the added predictability that a better standard would bring is that incumbent spectrum users would be more comfortable with the interference temperature metric. This NOI is the perfect vehicle to start the process.