



January 30, 2007

VIA ELECTRONIC FILING

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

**Re: Guitar Center, Inc.
Introduction of Unlicensed Devices in the "White Spaces"
ET Docket No. 04-186**

Dear Ms. Dortch:

Guitar Center, Inc. is concerned that the Commission may be poised to adopt rules that would result in significant harmful interference to wireless microphone and related high-quality audio systems. We believe that this result would hurt many consumers. Guitar Center recognizes that the Commission is eager to create opportunities for new radio frequency equipment, but reminds the Commission that the frequencies targeted in this proceeding are already in use by, among other things, high-performance audio products. These products and operations are an essential part of all live performances and events, large and small, and must be protected by any new equipment that the Commission permits to use the same frequencies. Without sufficient protection, many retailers and users of wireless microphones and other audio products will be severely disadvantaged.

Guitar Center, Inc. is the Nation's leading retailer of guitars, amplifiers, percussion instruments, keyboards, and pro audio and recording equipment. As a public company trading on NASDAQ, Guitar Center, Inc., through its subsidiary Guitar Center Stores, Inc., operates more than 195 stores across the United States. Additionally, Music & Arts Centers, a division of Guitar Center Stores, Inc., has over 100 stores specializing in band and orchestra instruments. Lastly, Musician's Friend, Inc., a subsidiary of Guitar Center, Inc., is the largest direct response retailer of musical instruments and accessories through its online website and mail order catalog. Guitar Center Stores, Inc. and Musician's Friend, Inc. sell many professional wireless audio products that operate in the "white spaces," and our customers depend on high-quality, reliable products.


If interference results from new TV band device operations, wireless microphone systems will not have the high performance audio qualities that customers require. Accordingly, customers and listening audiences will almost certainly be dissatisfied with the wireless audio product purchased. Therefore, it is imperative that the Commission adopt rules that sufficiently protect wireless microphones and audio devices from interference by unlicensed devices.

The proposed introduction of new TV band devices on the same frequencies already in use by wireless microphone systems raise difficult technical interference issues. While the proposal to allow new TV band devices in fixed configurations presents a technical challenge to protect existing spectrum users, the prospect of introducing new personal/portable TV band devices raises complex interference issues that, we understand, are far from being resolved. Guitar Center thus urges the Commission not to allow new personal/portable devices in the TV band by the digital television conversion date identified by the Commission unless and until further technology development first produces proven solutions to prevent interference to wireless microphones and related audio systems.

In considering technical rules for new fixed TV band devices, we urge the Commission to develop rules, supported by testing of wireless microphones and audio products in laboratory and field settings, necessary to ensure new TV band devices will not disrupt wireless microphone operations. We believe that parties who support the introduction of new TV band devices have the burden to demonstrate that new devices will not interfere with existing users of this spectrum. The rules and the Commission's testing must take into account that users of wireless audio products operate such equipment in a wide variety of locations. For example, Guitar Center's customers use wireless microphones for music, theater, commercial business and other live events and large gatherings, both indoors and outdoors.

Guitar Center's customers use wireless microphones and related high-quality audio equipment for many important functions and depend on reliable, interference-free use. Without appropriate interference safeguards, wireless microphones will not perform at the same high-quality level that users expect and demand today. Not only would such a result hurt distributors of audio equipment, it would eliminate a principal means of bringing live music and other events to the American public. We believe that result would not be in the public interest.

Sincerely,



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