



October 28, 2008

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554-0005

Dear Chairman Martin, Commissioner Adelstein, Commissioner Copps, Commissioner McDowell, and Commissioner Tate:

On behalf of MGM MIRAGE and our 64,000 employees, I am writing to express our strong opposition to the proposed order under consideration in the “White Spaces” proceeding as reported in the Commission’s recent press conference and media accounts.

Our Company, along with our colleagues from Harrah’s Entertainment, The Walt Disney Company and The League of American Theaters and Producers is alarmed by recent reports suggesting that the Commission is considering a “White Spaces” proposal that will impair wireless microphone operations and seriously jeopardize our ability to provide first-class audio production. The justification for this proposal is based on a 400-page technical report that was released to the public just a few days ago. Our technical staff and consultants have significant concerns about the analysis and conclusions drawn in this report, but neither the Commission, nor the people affected have had the benefit of any public input on this document.

MGM MIRAGE has an established and trusted brand that combines an enticing blend of entertainment and luxurious resort amenities to every corner of the world. This “blend” of entertainment is increasingly weighted less on gaming and more on the many offerings our resorts have to offer, such as live entertainment, weddings, concerts, corporate conventions, and first class theater. While these offerings range in scope, they all share one thing in common: they all incorporate the use of wireless microphones in their productions, exhibiting the diverse functionality of this type of equipment.

The audio production of a modern show on the Las Vegas Strip, or anywhere live entertainment is hosted at large venues, is premised on the availability of wireless microphone systems operating in unassigned TV channels. The very first day producers design a show it is decided how many systems are needed, how many channels are needed to host those systems, and what frequencies are available in those channels to meet the show’s demands. If these proposed new devices fail to protect wireless

microphone operation, virtually every convention center, concert hall, and wedding chapel across the country would be negatively impacted.

That is why it is critical that we have a thoughtful review process of the Office of Engineering and Technology's testing results report. Allowing a public review and comment period, as well as appropriate peer review process, will not undermine, but rather improve the Commission's decision-making process. If the data is appropriately extracted, and fundamental sound policy is developed based on that data, the extended comment period and independent peer review process will only add legitimacy to the claim that unlicensed devices can peacefully coexist with wireless microphones in the TV Band.

That is why we ask that the Commission not proceed to a final decision on such a controversial and important item that stands to affect a wide range of established businesses, including enterprises like MGM MIRAGE, without a 60-day formal comment period and an independent peer review process.

Thank you for your consideration of this very important matter.

Sincerely,

A handwritten signature in black ink, reading "J. Terrence Lanni". The signature is written in a cursive, flowing style.

J. Terrence Lanni
Chairman & CEO
MGM MIRAGE