

# Public Knowledge Suggests ULS is Broken

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*This piece has been updated to include comment from an FCC spokesman.*

Public Knowledge yesterday released a research that it says shows that the Universal Licensing System (ULS) is incomplete and too complicated.

In comments submitted to the FCC, the consumer advocate wrote that while searching the ULS for data to support policy positions in several spectrum proceedings, "PK noticed how challenging it is to gather meaningful information on carriers' spectrum licenses and affiliate control in order to understand the mobile wireless market."

Specifically, Public Knowledge was looking to gather information from the ULS on the competitive state of the wireless industry in order to inform recommendations on changes to the current spectrum screen.

The group argues that the ULS is not only complicated but incomplete.

A spokesman from the commission said the staff needs a chance to review the filing, but said the FCC is always interested in feedback that will help it improve its systems.

"There was no information on T-Mobile's ownership disclosures from 2005-2009. Surely T-Mobile must have applied for or altered a spectrum license at least once in five years. An ownership search by T-Mobile's registration number revealed archived files that provided the information. It turns out that the downloadable Ownership Database does not include archived files," Public Knowledge wrote in its comments," Public Knowledge wrote in it comments.

Public Knowledge suggests a number of changes to the system. Among others, Public Knowledge suggests the commission should make available all nonproprietary data that it has used in its Mobile Wireless Competition Reports; The Commission should ensure that filers comply with, and take seriously, reporting rules; The Commission should include archived files in downloadable databases; The Commission should consider how parties that care about spectrum might want to use the data.

"Information necessary to help promote competition and innovation in the wireless market is not available in any useful or easily attainable form right now," Public

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Knowledge wrote in its conclusion. "With better organization and transparency in the ULS, commenters can more easily acquire the data necessary to make and support arguments to improve the communications landscape."

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