

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Review of the Commission’s Part 95 Personal Radio Services Rules)	WT Docket No. 10-119
)	
1998 Biennial Regulatory Review – 47 C.F.R. Part 90 – Private Land Mobile Radio Services)	WT Docket No. 98-182 RM-9222
)	
Petition for Rulemaking of Garmin International, Inc.)	RM-10762
)	
Petition for Rulemaking of Omnitronics, L.L.C.)	RM-10844

Further Comments of Motorola Solutions, Inc.

On September 28, 2017, Motorola Solutions, Inc. (“Motorola Solutions” or “MSI”) submitted a Petition for Partial Reconsideration¹ of the Report and Order adopted in the above-captioned rulemaking to revise the Personal Radio Services regulated under Part 95 of the Commission’s Rules.² The *Recon Petition* requested that the Commission reconsider its decision to not allow automatic or periodic GPS and data transmissions in the General Mobile Radio Service (“GMRS”) based on the lack of an adequate record on which to consider the proposal.³ The *Recon Petition* disagreed with this decision and argued that the issue was sufficiently raised in the public record to enable the Commission to determine on the merits whether automatic or periodic data transmissions should be allowed on GMRS frequencies. Motorola Solutions urged

¹ Petition for Partial Reconsideration, Motorola Solutions Inc., WT Docket No. 110-119, submitted September 28, 2017 (*Recon Petition*).

² *Review of the Commission’s Part 95 Personal Radio Service Rules*, WT Docket No. 10-119, *Report and Order*, 32 FCC Rcd 4292 (2017) (*Report and Order*).

³ *Id.* at ¶ 39.

the Commission to reconsider its dismissal of this issue and further address the proposal in a subsequent order.

The deadline for filing oppositions to Motorola Solutions' Petition expired on December 27, 2017, without any party objecting to MSI's request for partial reconsideration. The lack of any opposition should incent the Commission to quickly move forward on this request and update the GMRS rules to enable location features and applications that are common place in other radio services in 2017. Enabling automatic transmissions of GPS coordinate data will allow individuals to better track the location of friends and family members in outdoor locations where commercial network coverage is often lacking such as woods and forests, state and national parks, and ski slopes. Such features will not replace the popular "Find-a-Friend" applications found on commercial wireless devices, but will provide similar tracking capabilities in remote areas. Such applications that enhance public safety are clearly in the public interest and should be permitted in the GMRS.

The fact that the ideal use cases for this GMRS feature would occur in remote areas where there are few users should mitigate concerns over channel occupancy or interference between voice and data operations on shared channels. Even so, the record contains discussion on this point. Uniden America Corporation provided comments approximately two years prior to the adoption of the *Report and Order* stating that automated messages must be limited to no more frequently than once every 2 minutes and no more than 5 seconds in duration.⁴ Motorola Solutions supplemented this record by stating that the transmission of GPS coordinates would

⁴ *Ex Parte* Letter from Gregg P. Skall, representing Uniden America Corp., to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 10-119, filed June 11, 2015.

typically occupy a GMRS channel for “approximately 1-2 seconds” and that “allowing periodic transmissions every 30-60 seconds should not result in channel congestion.”⁵ While Motorola Solutions does not believe that the risk of interference gives rise to additional restrictions in the rules, it would not oppose reasonable conditions such as these to control the duty cycle of automated data transmissions over GMRS frequencies. And, as stated in the *Recon Petition*, the periodicity of the transmitted data is the only significant difference between allowing manually or automatically generated transmission of location data and the record adequately addresses the point.⁶

As fully detailed in the *Recon Petition*, the Commission is legally capable of determining whether allowing automatic or periodic GPS and data transmissions on GMRS frequencies would be in the public interest. The Commission should act expeditiously on this matter and bring this long proceeding to conclusion.

Respectfully Submitted,

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January 08, 2018

⁵ *Ex Parte* Letter from Edward “Smitty” Smith, representing Motorola Solutions, Inc. to Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 10-119, filed April 17, 2017.

⁶ *Recon Petition* at 4, 5.