**Before the**

**Federal Communications Commission**

**Washington, DC 20554**

In the Matter of

Expanding Flexible Use in Mid-Band Spectrum GN Docket No 17-183

Between 3.7 and 24 GHz

**REPLY COMMENTS OF**

**SECURE CARE PRODUCTS, LLC**

1. **INTRODUCTION**

Secure Care Products, LLC (“SCP”) provides the below reply comments to *the Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz Notice of Inquiry* adopted by the Commission on 8 August 2017 (the “NOI”), specifically potential WiFi services in the 3.7-4,2 GHz and 5.925-7.125 GHz bands.

SCP is a domestic and international Real Time Location Solution (“RTLS”) and Security company engaged with the Healthcare, Acute Care Infant Security, Wandering Resident Protection, Warehousing, Manufacturing and Hospitality and other market verticals. SCP uses the Decawave Chip technology for its Ultra Wide Band (“UWB”) RTLS technology for indoor and outdoor applications.

1. **USE OF 3.7-4.2 GHZ AND 5.925-7.125 GHZ BANDS FOR RTLS**

Within the 3.7-4.2 and 5.925-7.125 GHz bands, SCP has developed, at great financial expense over several years of R&D, a state of the art RTLS product line targeted for domestic and international sale in the market verticals noted above. As a company, we had options in selecting the technology desired to enable this product line. The variables in the selection where many. One key variable was the lack of WiFi allowed in the majority of the noted frequency bands noted above that strategically limited the potential interference that could be caused by the prolifically growing WiFi wireless products entering into the marketplace and defined by the Federal Commutations Commission for allowed use within regulated frequency bands for WiFi.

1. **CONCLUSION**

As the Decawave notes in its October 2, 2107 comments in the “Potential New Entrants”

section, SCP requests the Commission consider 3.7 to 4.2 GHz band and 5.925 to 7.125 GHz band not be opened to U-NII usage due to the likely RF interference these new transmitters will cause to existing deployed equipment and systems unlicensed under FCC PART 15 Subpart C Section 15.250 and/or Subpart F. Or, any new unlicensed users allowed should also be subject to the -41.3 dBm/MHz power limit so those financially invested in these regulations presently are not put in a position where those technologies are put in a competitive disadvantage to new higher power products and/or needing to re-certify to new or replacement FCC regulations at great expense.