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93-235

December 20, 1993

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DEC 22 1993

Donna R. Searcy, Secretary  
Federal Communications Commission  
Washington, D.C. 20554

FCC - MAIL ROOM

Dear Ms Searcy:

Enclosed please find the original and twelve copies of Cobra Electronics Corporation's Reply Comments on ET Docket No. 93-235, RM-8094, in the matter of Amendment of Parts No. 15 and 90 of the Commission's Rules to provide additional frequencies for Cordless Telephones. Please distribute them to the appropriate parties for consideration.

An additional copy is enclosed, along with a self addressed stamped envelope, to be stamped with date received and returned to me.

Sincerely,

**COBRA ELECTRONICS CORPORATION**

*Max Rogers*

Max Rogers  
Chief Engineer

MR:br

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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, D.C. 20554

In the Matter of )  
 )  
 Amendment of Parts 15 and 90 )  
 of the Commission's Rules to )  
 Provide Additional Frequencies )  
 For Cordless Telephones )

ET Docket No. 93-235  
 RM - 8094

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Reply Comments of Cobra Electronics Corporation FCC MAIL ROOM

Cobra Electronics Corporation (hereinafter "Cobra") respectfully submits the following Reply Comments in the above captioned proceeding.

**I. General**

Cobra understands that a total of 15 sets of comments were submitted to the Commission in this proceeding and that in general the majority were in support.

Cobra filed comments in support and does not wish, because of limited time, to make any specific comments concerning the issues brought up by those not in support, other than to say that there doesn't seem to be any evidence to substantiate their concerns.

Cobra however would like to expand some on its own comments concerning automatic channel monitoring and the 30 days effective date.

**II. Automatic Channel Monitoring**

Cobra feels that the proposed automatic channel monitoring system safeguards the PLMRS network but does need further clarification.

As stated in its comments, Cobra feels that the automatic channel monitoring system as proposed is too vague, and sited an example, about the consequences, if a PLMRS jammed the portable at the time when the base was trying to contact the portable to see if it was busy. Other examples could be sited but the point is there are other examples.

Therefore, doesn't it make sense to consider all known situations and draw appropriate conclusions before there is a Report and Order or should each individual manufacturer apply his or her own interpretation and hope it will be accepted? Cobra prefers to know all of the various ground rules up front so that there are no surprises that could occur during FCC approval, since this is typically after the hardware design is set and software is committed.

### III. 30 Days Effective Date

In its comments Cobra said that it was extremely (emphasis added) concerned about only 30 days and proposed a 6 to 12 month period instead.

Cobra wants to emphasize the fact that it feels fortunate that it survived the CB channel expansion in the mid 70s and the cordless phone channel expansion in the mid 80s. If you look at all of the current companies that are in the 46/49 cordless phone business today, only a few besides Cobra, were in the business with a full line of cordless phone products prior to FCC approval to go from 5 to 10 channels in the mid 1980s. This suggests 2 things:

1. Most of the companies in the 46/49MHz cordless phone business today were not in the prior 1.7/49MHz business and therefore may not possibly be aware of the potential problems that can occur when there is channel expansion.
2. Some of the companies that were in the cordless phone business prior to 10 channels are out of this business today. To Cobra's knowledge both the CB and 46/49-10 channel expansion programs also only had a 30 day or less effective date after the Report and Order. Is there possibly a lesson to be learned here?

Cobra thinks so and therefore requests a 6 to 12 month period after the Report and Order instead of 30 days, to try and minimize the disruptive nature of a channel expansion program which is obviously needed but still needs to also be obviously, logically implemented.

**IV. Conclusion**

In conclusion, Cobra believes there is a real need for the 15 new proposed duplex frequencies and is very supportive of the NPRM, but does hope that the automatic channel monitoring system will be well defined and that the 30 days effective date will be extended to 6 to 12 months.

Respectfully Submitted,

**COBRA ELECTRONICS CORPORATION**

  
Max Rogers  
Max Rogers  
Chief Engineer