

# Staff Proposal

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## Field Disturbance Sensors:

- Not a threshold
- Not technically meaningful
- Arbitrarily singles out a class of Part 15 devices

# Staff Proposal

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Effectively concentrates Part 15 operations into 14 MHz:

- Some Part 15 systems designed to require more than 14 MHz
  - Part 15.247 rules require spreading
- Reduces opportunity of all systems to avoid interference
- Protected LMS would reduce useable Part 15 spectrum by nearly 50%

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## Interference to Part 15 Ignored:

- LMS will increase interference to Part 15
  - Increased *new* traffic in band
- High-power, wideband forward links are especially troublesome
  - Affects all other users of band significantly
  - Not necessary or efficient for locating services

# Staff Proposal

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A change of this magnitude to the original NPRM requires formal notice and comment.

# Part 15 Community Proposal

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## Interference -- A Key Issue:

- Part 15 and LMS will interfere with each other
- Hard data and field testing support this
- Hierarchical approach to solving interference issues will present enforcement nightmare
- Extent of interference will ultimately depend on Part 15 and LMS market penetration

# Part 15 Community Proposal

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## Forward Link Interference:

- Wideband forward links should not be permitted
  - Will interfere with most users of band
  - Likely to limit Part 15 operation to 4 MHz
  - Inefficient and not functionally necessary
- Move narrowband forward links to upper edge of the band
  - Reduces front-end interference potential
  - Close to paging channels in 930 MHz area

# Part 15 Community Proposal

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## Reverse Link Interference:

- Presumption of non-interference to LMS receivers
- No Part 15 thresholds
- Power and duty cycle limits must be developed for LMS reverse links

# Part 15 Community Proposal

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## A True Compromise:

- Permits LMS to be established as a new service
  - Initial position was to maintain the *status quo*
- Requires Part 15 to accept significantly more interference
- Permits Part 15 to continue to operate
- Requires development of best technology
- Encourages cooperation between Part 15 and LMS

# LMS Community Proposal

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## Not a Real Compromise:

- Establishes a *new* licensed service in the band
  - Not anticipated by Part 15 operations
- Maintains the hierarchy
  - Good faith negotiations change nothing
- Makes no accommodation for Part 15 operations
- Based on analysis of historical interference
  - Not a reliable forecast of future interference



**NETCOMM FIELD TESTS** – NetComm, Edison's new Network Communication system, is currently linking more than 1000 Edison Valencia-area customers' new all-electronic meters to the utility's computers via a communications network of high-frequency packet switching radios located atop street lights.

Southern California Edison



