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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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September 22, 1994

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Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

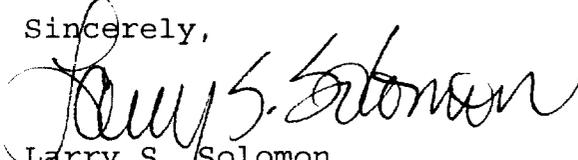
Re: PR Docket No. 93-61
Automatic Vehicle Monitoring Systems

Dear Mr. Caton:

On Wednesday, September 21, 1994, Newton Minow, a member of the Board of Directors of Metricom, Inc., Gary Green and Michael Pettus of Metricom, Inc., Charles Cooke of Southern California Edison Company and Henry Rivera and I, of this firm, met with Commissioner Quello and his Legal Assistant, Lauren Belvin, and with Commissioner Ness, and her Legal Assistant, David Siddall, to discuss the views of Metricom, Inc. and Southern California Edison Co. as stated in various filings on proposed solutions and compromises in this proceeding. The attached materials were used in connection with our discussions.

Two copies of this letter are being submitted to the Secretary of the Commission pursuant to § 1.1206(a)(1) of the Commission's Rules. Because meetings ran late into the afternoon, this notice is being filed the day after the meetings.

Sincerely,


Larry S. Solomon

Attachment

cc: Commissioner James Quello
Commissioner Susan Ness
Lauren Belvin
David Siddall

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P.R. Docket 93-61:
Automatic Vehicle Monitoring Systems

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Presentation on Recent Staff Proposal
to
Commissioner James H. Quello

Metricom, Inc.
Southern California Edison Company
September 21, 1994

The Operational Problem

Part 15 and AVM/LMS can not co-exist as presently proposed without harm to both:

- Part 15 transmissions will interfere with AVM/LMS receivers
- Band hierarchy enables AVM/LMS to force Part 15 devices to cease operation

The Enforcement Problem

Forcing Part 15 devices to cease operation will not work:

- Identification of interference source
- Forcing cessations of operation
- Public outcry
 - To FCC
 - To Congress
- Elimination of Part 15 applications

Metricom

Metricom Network Applications:

- Utility distribution automation
 - Improved service and reduced costs to ratepayers
 - Energy conservation; reduced pollution
- Industrial communications
 - Waste water districts
 - Gas well field monitoring
- Wide-area data communications networking
 - Access to corporate resources
 - Wireless Internet/NII
 - Low cost for schools and individuals

Metricom

Advantages offered Metricom users:

- High speed performance
 - Not possible on most licensed bands
- Low cost service
 - Cost of spectrum will preclude this in PCS bands
- High capacity
 - Amount of spectrum not available elsewhere
 - Regional area networks
 - (Not possible with unlicensed PCS)

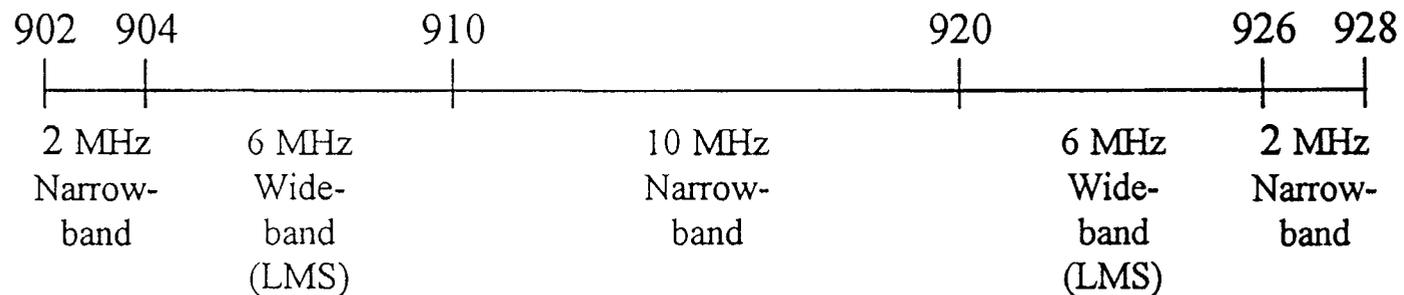
Southern California Edison

Extensive User of Metricom Part 15 Radio Network:

- Benefits
 - Voltage conservation saves approximately 1 billion kWh per year
 - Yields \$40 million annual savings to ratepayers
 - Reduces fuel consumption at generation plants
 - Additional benefits include outage detection and remote switching
- Requires at least 30,000 radio network
 - More than 6,000 installed at SCE to date
 - Installed using ratepayer money

Staff Proposal

- Segments Band as Follows:



- In the two 6 MHz segments:
 - Part 15 operator must resolve interference if Part 15 device:
 - a. uses outdoor antenna more than 5 meters above ground
 - b. uses equipment not meeting new technical requirements
 - c. is a field disturbance device
 - Part 15 device complying with one of these thresholds is presumed not to cause interference

Staff Proposal

Threshold Issues:

- Makes Part 15 resemble licensed service
 - Each antenna location must be identified, scrutinized
 - Results in increased cost to consumers

- Imposes significant enforcement and legal burdens
 - Which specific device is causing interference?
 - House-to-house searches?

Staff Proposal

Proposed Thresholds Change Part 15 Rules:

- No FCC rule, order or discussion limits Part 15 device location
- Part 15 antennas above 5 meters do not violate any FCC rule
- Automatic thresholds are inconsistent with hierarchy rules
- Automatic thresholds are not legally sustainable

Staff Proposal

Height Restrictions Impermissibly Change Part 15 Rules.

- Beyond scope of proceeding (see Erratum)
- Arbitrarily single out a class of Part 15 devices
- Will force Part 15 devices out of band
- Discourages further development of Part 15 devices

Staff Proposal

Height Restrictions Are Technically Meaningless

- Fail to consider terrain and structures
 - relative height of interferers
- LMS receivers located and optimized to receive from street-level and in-building LMS transponders

Staff Proposal

Height Restrictions Devastating To:

- Metricom
- Ademco
- Cylink
- Tetherless Access
- CellNet
- Many others
- Future Part 15 development

Field Disturbance Sensors:

Field Disturbance Sensors:

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

Staff Proposal

Effectively concentrates Part 15 operations into 14 MHz or possibly 4 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%

Staff Proposal

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

Conclusion

Do not adopt any resolution to this proceeding that contains a height restriction on Part 15 devices.

**P.R. Docket 93-61:
Automatic Vehicle Monitoring Systems**

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to
Commissioner Susan Ness**

**Metricom, Inc.
Southern California Edison Company
September 21, 1994**

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Southern California Edison

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- Benefits

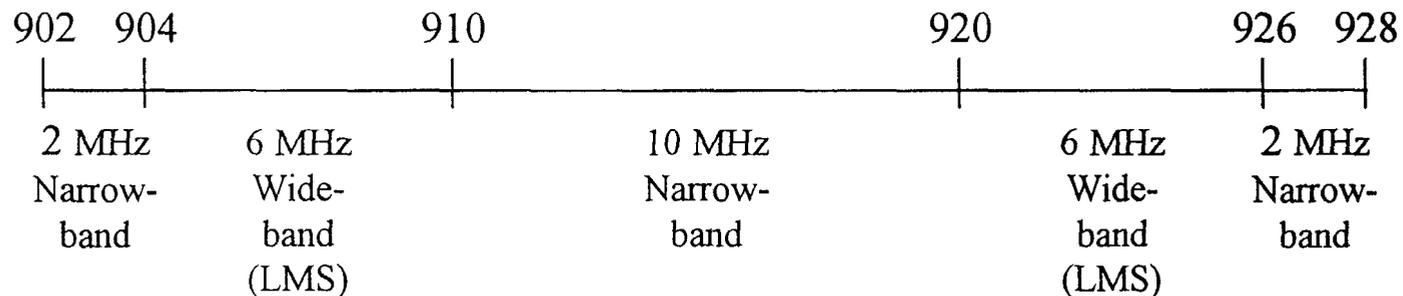
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