

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

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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

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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

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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

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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%

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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.