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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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December 12, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20006
STOP CODE: 1170

Re: Ex Parte Communication in PR Docket No. 93-61
on behalf of Pinpoint Communications, Inc.

Dear Mr. Caton:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, notice is hereby given of an *ex parte* communication regarding the above-referenced proceeding.

I am attaching a letter sent today to Ms. Rosalind K. Allen, Chief of the Commercial Radio Division of the Wireless Telecommunications Bureau. The position set forth in the attachment to the letter should not be viewed as the optimum resolution of this proceeding, nor as the resolution preferred by Pinpoint. Pinpoint has not supported exclusivity and auctions in the 902 - 928 MHz band. If, however, there are to be auctions of some 14 MHz in sub-bands that would best accommodate those wide-area system proponents who have claimed they cannot share spectrum, the proposal set forth by Pinpoint in the attachment to this letter should be implemented in order that there be a shared spectrum option for wide-area AVM.

Should any question arise concerning this matter, please contact me.

Respectfully submitted,



David E. Hilliard
Attorney for Pinpoint Communications, Inc.

cc: Rosalind K. Allen, Esq. (w/o encl.)

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List A B C D E

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Ruth Milkman, Esq.
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Ms. Jill Lockett

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December 12, 1994

Rosalind K. Allen, Esq.
Chief, Commercial Mobile Radio Division
Wireless Telecommunications Bureau
Federal Communications Commission
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2025 M Street, N.W.
Washington, D.C. 20554

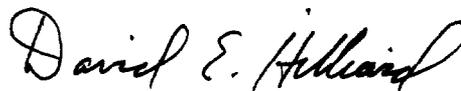
Re: PR Docket No. 93-61

Dear Ms. Allen:

As a follow up to our discussions last Friday, I am transmitting herewith a proposal by Pinpoint Communications that seeks nonexclusive operation of wide-area AVM systems in spectrum not subject to auctions. This particular proposal does not propose the use of Pinpoint's previously proposed wideband forward link in order to address concerns expressed by Part 15 interests.

Please call me with any questions concerning this proposal.

Respectfully,



David E. Hilliard
Counsel for Pinpoint Communications, Inc.

Attachment

cc: Mr. William Caton

The Commission will authorize on a nonexclusive basis wide-area AVM systems in the spectrum in this band that is not subject to auctions on the following basis:

1. The central 10 MHz would be available for location pulses from mobiles at a maximum power of 40 watts ERP.
2. The lower 2 MHz (902-904 MHz) would be available for shared use as follows:
 - a. Location polls from base stations at a maximum power not to exceed 500 watts ERP using spread spectrum (either direct sequence or frequency hopping) modulation techniques; and
 - b. Mobile and base data communications related to the vehicles being located using spread spectrum (either direct sequence or frequency hopping) modulation techniques; mobile and base station power for such communications would be the same as stated above.

Variants on this proposal are detailed in the attachment.

Applicants for such operating authority shall make the following showings:

1. That operation can be conducted on a shared basis among similarly situated wide-area AVM systems so as not to preclude entry by other applicants. Such sharing would be enforced through mutual obligations to resolve interference as in Section 90.173(b) of the Commission's rules.
2. That the wide-area applicant is prepared to take steps to minimize the potential for interference to local-area AVM operations. The wide-area applicant will receive no interference protection from local-area systems. Local-area systems would be obligated to cooperate with wide-area systems in finding solutions to harmful interference received from wide-area systems which shall be resolved at the expense of the wide-area system; and
3. That the wide-area system will employ reasonable techniques to reduce the adverse effects on the operation of devices authorized under Part 15 of the Rules, provided however that no specific Part 15 device shall be protected from interference. For example, wide-area applicants would have to consent to transmitting a "Busy/Idle Signal" that high-powered wide-area Part 15 networks, as well as other Part 15 devices, could use to maximize their interference free use of the spectrum.

Wide-area AVM systems authorized under these provisions shall not be entitled to protection from harmful interference from devices operating in accordance with Part 15 of the Rules, but shall be accorded protection from interference caused by operations under Part 97 of the Rules.

ATTACHMENT

OPTION A

Same as the main proposal but the central 10 MHz could be used not only for location pulses from the mobiles but also for the shareable spread spectrum return data link (maximum bandwidth of 2 MHz). The forward link would remain in the 902-904 MHz band as stated in the main proposal.

OPTION B

Same as OPTION A but the forward link would be located in the central 10 MHz (maximum 100 watts ERP, 2 MHz bandwidth) leaving 8 MHz for the location pulses from the mobiles.

OPTION C

Utilize a 2 MHz forward link as in option B, however, put it in the 902-904 MHz sub-band to clean up the central part of the band.