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December 14, 1994

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FCC MAIL ROOM

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

Dear Secretary Caton:

ACS Communications is one of many small high growth companies that plan to use the unlicensed low power portions of the frequency spectrum covered by "Part 15" rules. ACS is unique in that we have gone from 80% off-shore manufacturing over the past four years to 100% on-shore. As a result we have improved product quality and doubled our warranty period from one year to two. We have also grown at a 35% per year rate for the past three years and our employment increased to 180 employees (15%) in 1994.

ACS has plans for continued strong growth in wireless and has encouraged many of its suppliers to develop components that will be used in low power Part 15 devices. Such research and development efforts are a direct result of the opportunity the FCC has presented to industry for developing businesses to address customer needs with Part 15 applications.

We are a strong and successful competitor in our base business which is the development, manufacture and sale of telephone headsets or more broadly handsfree and eyesfree communications. ACS and a large number of industry analysts predict that most wired headset users will migrate to wireless products over the next five years. This will involve a large number of users but is insignificant compared to the large numbers of potential customers who occupy what we call, "The Last Five Feet."

There is a growing need for very low power wireless links to terminals and networks. These devices link the users to the LANs, WANs and communications networks. Increased mobility will result in improved productivity and safety in many industrial applications. There will also be many new consumer or retail applications for short distance wireless links. For this reason, wireless communications offers American suppliers and consumers the opportunity to take a worldwide leadership position in the development of technologies, manufacturing processes, and the use of one of the future's leading opportunities.

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Narrow band and spread-spectrum transmissions over medium and long distance represent a completely different set of problems compared to extremely short distance transmission and reception. Narrow band and broad band AVM transmissions need licensing and general regulation. If, however, transmission distances are extremely short and levels are down in the noise level of the magnitude of electric motors or other permitted emissions, then it seems that the FCC would look favorably upon encouraging such uses.

Rather than restricting Part 15's low power access I would like to propose an increase in spectrum and permissible power levels so that input and output devices for voice and data can be used for the short haul distances of 5 to 30 feet. If we set a strong example in this area other more parochial administrations worldwide will be forced to follow our lead if they wish to participate in this important new arena.

Please give industry a chance to keep this exciting opportunity open for the growth we deserve after developing these capabilities. As a nation we will compete most effectively if we have a wide variety of products and services. This approach would be compatible with broadband AVM uses but would not force a choice between one or the other.

Please contact me at ACS Communications, Inc., 10 Victor Square, Scotts Valley, California 95066 or phone (408) 438-3883 if you wish to discuss this further.

Sincerely,



Phillip A. Gattey  
President & C.E.O.