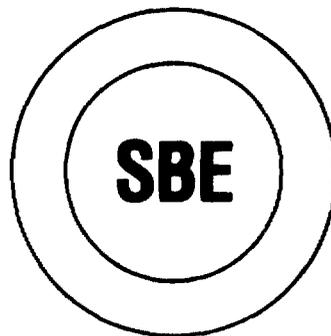


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Reply Comments of the  
Society of Broadcast Engineers, Inc.

ET Docket 95-177  
Operation of Unlicensed, Part 15  
Biomedical Telemetry Devices  
on Unoccupied TV Channels



May 16, 1996

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SOCIETY OF BROADCAST ENGINEERS, INC.  
Indianapolis, Indiana

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERATION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Amendment of Part 15 of the ) ET Docket No. 95-177  
Commission's Rules to Permit Operation )  
of Biomedical Telemetry Devices on )  
VHF TV Channels 7-13 and on )  
UHF TV Channels )

To: The Commission

**Reply Comments of the Society of Broadcast Engineers, Inc.**

The Society of Broadcast Engineers, Incorporated (SBE), the national association of broadcast engineers and technical communications professionals, with more than 5,000 members in the United States, hereby respectfully submits its reply comments in the above-captioned Notice of Proposed Rule Making (NPRM) relating to unlicensed, low-power biomedical telemetry devices.

**I. Suggestion by CCTG that Licensed, Part 74, Broadcast Auxiliary Stations Should Protect and Be Required to Provide Prior Coordination To Unlicensed, Part 15, BTD's is Ludicrous**

1. SBE will limit its reply comments to one aspect of the Critical Care Telemetry Group ("CCTG") comments that is so outrageous as to only be characterized as "ludicrous:" namely, the suggestion that licensed, Part 74, Broadcast Auxiliary Stations operating on VHF high band or UHF television channels should be required to conduct prior coordination with health care facilities using unlicensed, Part 15, biomedical telemetry devices ("BTD's") also operating on VHF high band or UHF television channels.<sup>1</sup>

2. CCTG has apparently lost track of, or doesn't understand, the fundamental restriction applying to unlicensed, Part 15 radio frequency devices: such devices must not cause interference to higher priority, licensed services, and must accept any interference that might be caused by the authorized operations of licensed stations. For CCTG to suggest that Broadcast Auxiliary stations such as FM wireless microphones should have the burden of

<sup>1</sup> CCTG comments, at Page 9, Section VI, Subpart A, last paragraph, and also at Page 10, last paragraph, of the Engineering Statement submitted in support of the CCTG comments. Also at Page 2 of the Engineering Statement accompanying the CCTG comments.

**SBE Reply Comments: ET Docket 95-177**

prior coordination, or any coordination whatsoever, to unlicensed, Part 15 BTD's is outrageous. The Commission should deal with such unmitigated presumption harshly by dismissing the CCTG proposal.

3. Broadcast Auxiliary licenses pay application fees when initially filing for their authorizations, and then must pay annual user fees thereafter. Users of unlicensed, Part 15 devices pay no such fees and are not entitled to any protection whatsoever from licensed services.

4. CCTG's request for protection from "interference" from licensed Broadcast Auxiliary stations operating on VHF high band or UHF television channels only underscores the fundamental flaw of greatly expanding the use of unlicensed and unprotected devices for medical telemetry purposes. Potentially life-critical biomedical telemetry has no place as a bottom-of-the-food-chain Part 15 radio frequency device, especially if expanded outside of hospitals to such health care providers as assisted care living facilities or secondary care nursing homes. This is inherently not in the public interest and a bad idea. If CCTG needs more spectrum for biomedical telemetry functions, it should explore bands where such use can occur on a licensed, and therefore protected, basis.

Respectfully submitted,

Society of Broadcast Engineers, Inc.

By Terrence M. Baun  
Terrence M. Baun, President

By Dane E. Ericksen  
Dane E. Ericksen, P.E., CSRE, CSTE  
Chairman, SBE FCC Liaison Committee

By Christopher D. Imlay  
Christopher D. Imlay, Its Counsel

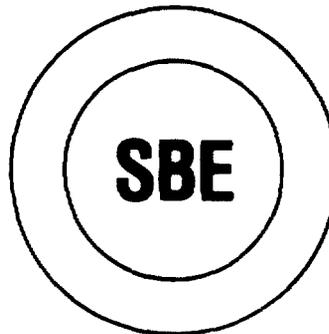
May 16, 1996

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