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LAW OFFICES  
GINSBURG, FELDMAN AND BRESS  
CHARTERED  
1250 CONNECTICUT AVENUE, N.W.  
WASHINGTON, D.C. 20036-2600  
TELEPHONE (202) 637-9000  
FAX (202) 637-9195  
TELEX 4938614 CABLE LEGAL

8201 GREENSBORO DRIVE  
MCLEAN, VA 22102  
TELEPHONE (703) 821-3610  
FAX (703) 821-7990

CORRESPONDENT OFFICE  
9, RUE BOISSY D'ANGLAS  
75008 PARIS, FRANCE

LARRY S. SOLOMON  
(202) 637-9049  
lsolomon@gfblaw.com

June 5, 1997

RECEIVED

JUN 5 1997

Federal Communications Commission  
Office of Secretary

EX PARTE

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

PR Docket No. 89-552  
Amendment of Part 90 to Provide for Use of 220-222 MHz  
Band

GN Docket No. 93-252  
Implementation of Sections 3(n) and 332 of the Act

PP Docket No. 93-253  
Implementation of Section 309(j) of the Act

GN Docket No. 96-228  
Wireless Communications Service

WT Docket No. 97-12  
Amateur Spread Spectrum

WT Docket No. 96-6  
Commercial Mobile Wireless Service

Dear Mr. Caton:

On Wednesday, June 4, 1997, Gary Green, Chief Operating Officer of Metricom, Inc., Michael Pettus, Director Systems Engineering of Metricom, Inc., and Henry Rivera and I, of this firm, met with Dan Phythyon, Roz Allen, Jonathan Cohen, Elizabeth Lyle, Tom Stanley, Karen Gulick and Steve Weingarten of the Wireless Telecommunication Bureau.

At this meeting, Metricom reiterated its views, as set forth in its various filings in the above referenced proceedings. No new information was presented regarding these proceedings. In addition to addressing these proceedings, Metricom's unlicensed wireless

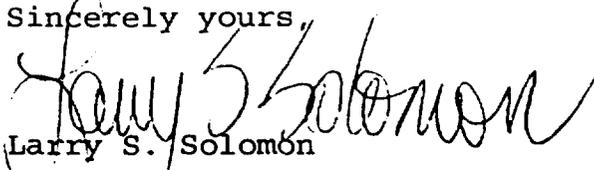
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William F. Caton  
June 5, 1997  
Page 2

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Two copies of this letter, along with the attached materials for each of the above-referenced proceedings, are being submitted to the Secretary pursuant to the provisions of § 1.1206(b)(1) and (2) of the Commission's Rules.

Sincerely yours,



Larry S. Solomon

Attachments

cc: Mr. Dan Phythyon  
Ms. Roz Allen  
Mr. Jonathan Cohen  
Ms. Elizabeth Lyle  
Mr. Tom Stanley  
Ms. Karen Gulick  
Mr. Steve Weingarten

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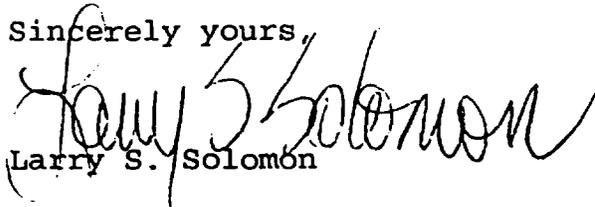
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***Metricom Priorities  
at the  
Wireless Telecommunications  
Bureau***

Gary Green  
Chief Operating Officer

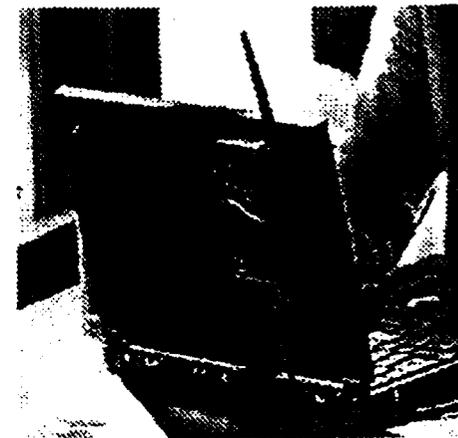
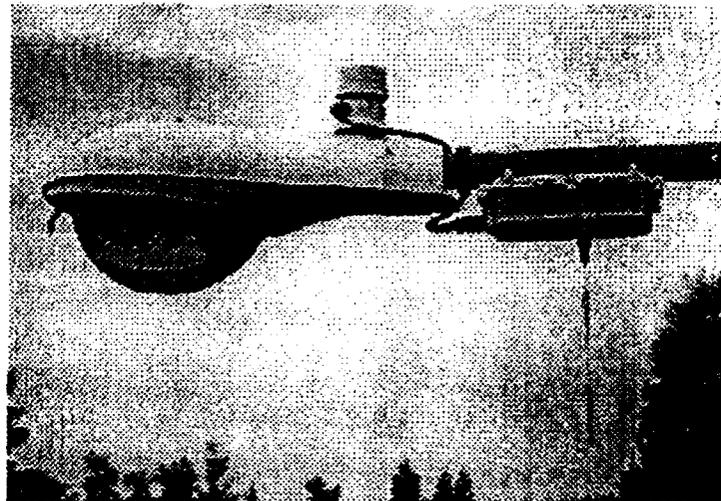
Mike Pettus  
Director, System Engineering

Metricom, Inc.  
June 4, 1997



# *Building a National, Wireless, Data Network for Portable & Fixed Computers*

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# *Metricom Overview*

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- Public company (MCOM), founded in 1985
  - Headquartered in Silicon Valley
  - 240 employees and consultants
- Emerging wireless data communications service provider
- Thousands of radios operating across US
- Uses unlicensed, shared spectrum
- Part 15 Coalition member

# *Two Divisions*

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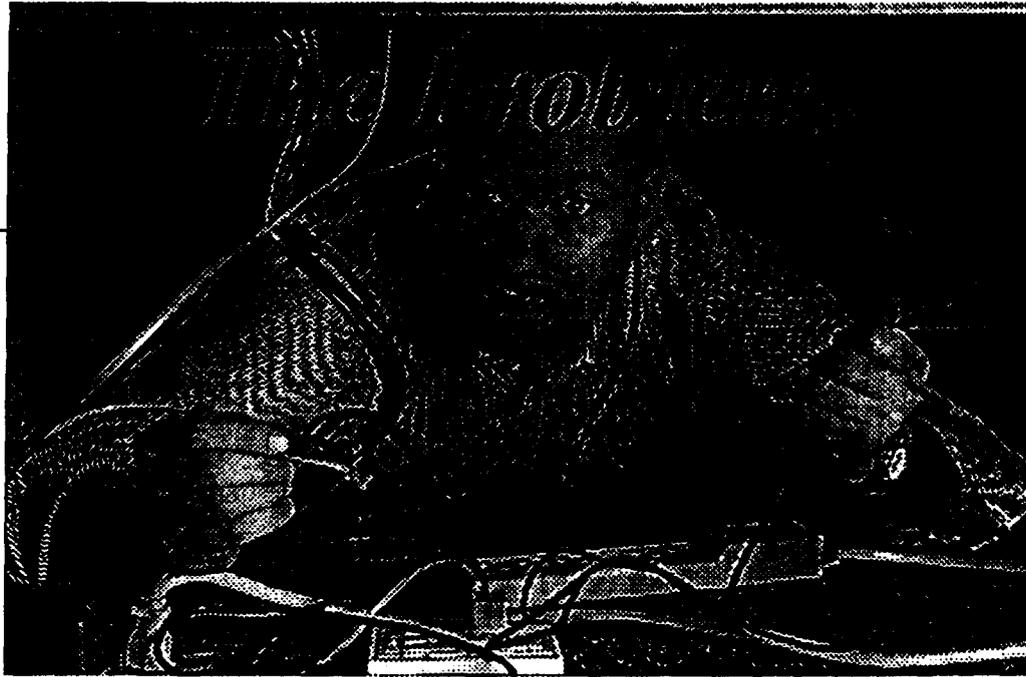
- RICOCHET DIVISION:

*The wireless modem and Internet service*

- INDUSTRIAL COMMUNICATIONS DIVISION:

*“One Network” solution for industrial customers*





- People require connectivity away from the desk
- Phone lines are an inefficient way to send data
- “Busy signal” is a growing problem
- Most wireless access solutions are expensive, slow and complicated

# *Ricochet: A Unique Solution*

---

- Fast, affordable, easy
- Wireless Internet
- Wide area wireless data communications
- Inexpensive, high capacity infrastructure
- Uses unlicensed, shared spectrum

# *Ricochet Facts*

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**Fast:** *14.4 to 28.8 kbps to end user*

**Affordable:** *\$29.95 flat monthly service fee*

**Compatible:** *Plug & play single-source solution*

**Transportable:** *Connectivity wherever, whenever*

**Secure:** *Frequency hopping and optional encryption*



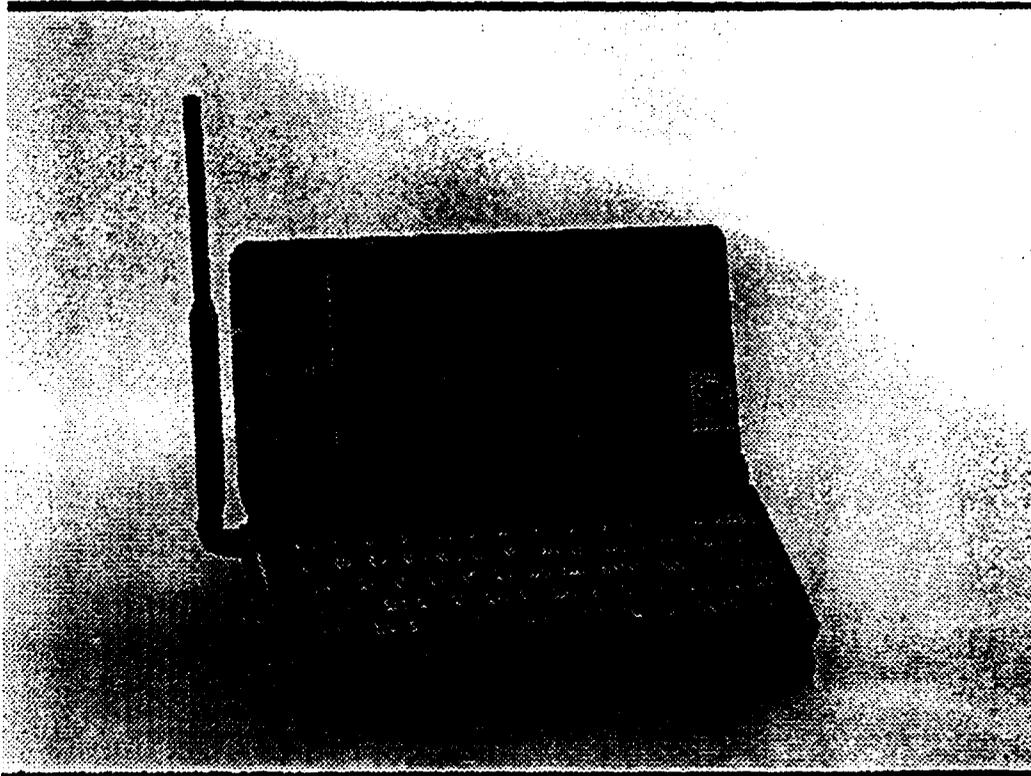
# *Three Target Markets*

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- Education (K-12 and university)
- Corporate
- Metropolitan (individuals)

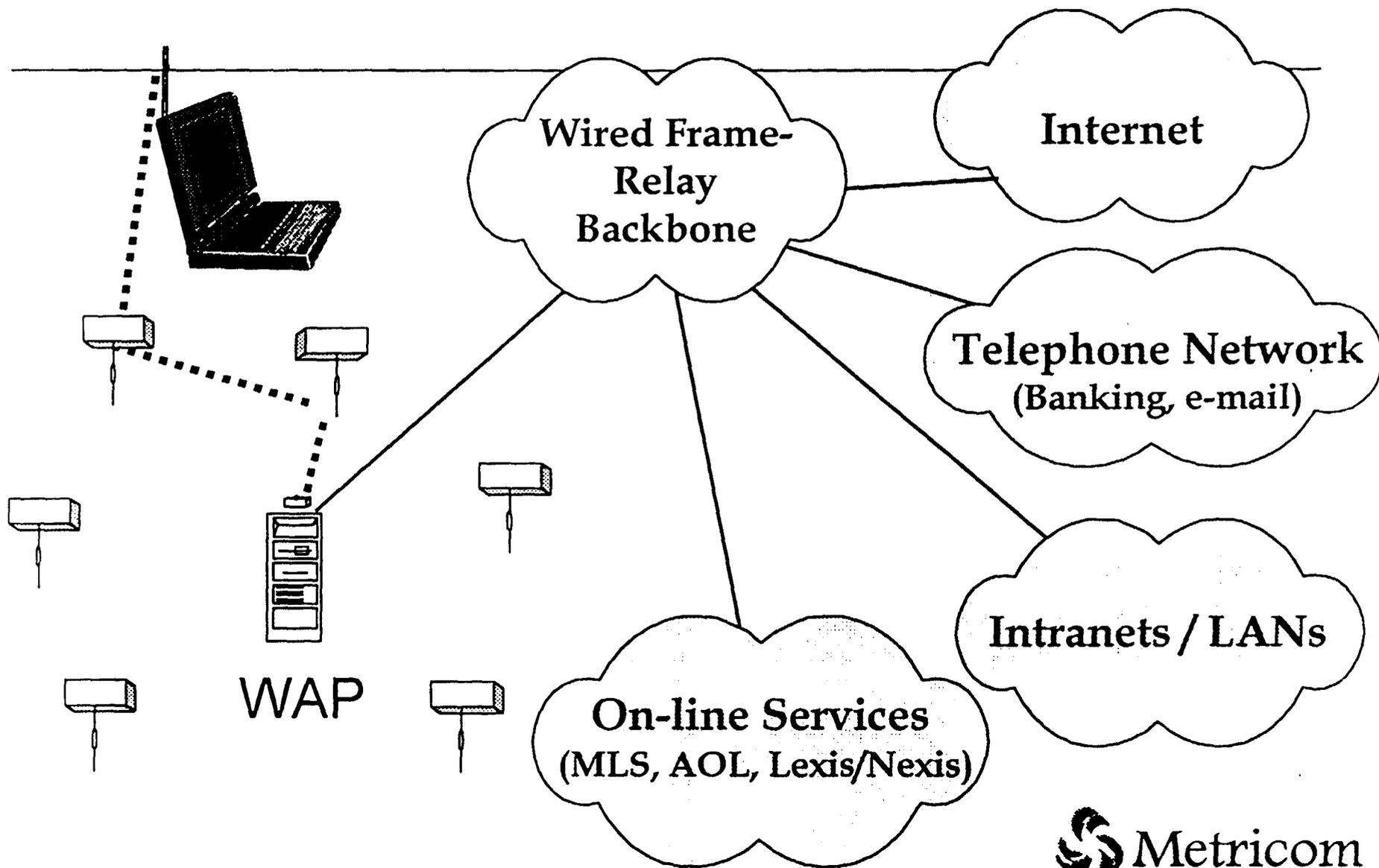
# *Ricochet Makes Handheld Computers Powerful Tools*

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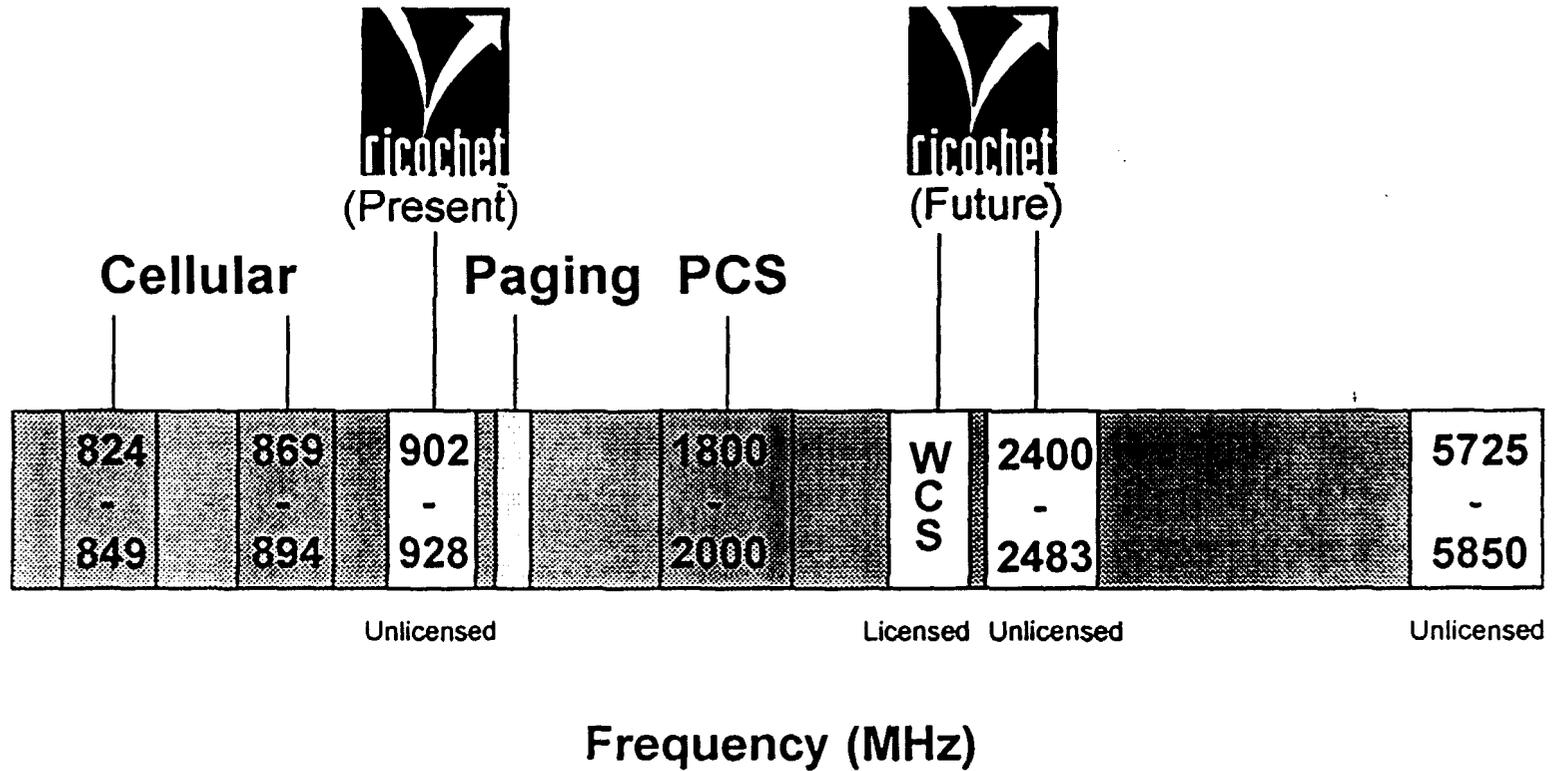


- E-mail
- Internet
- Stocks/Finance
- Desktop  
synchronization

# *Ricochet Takes You Many Places*



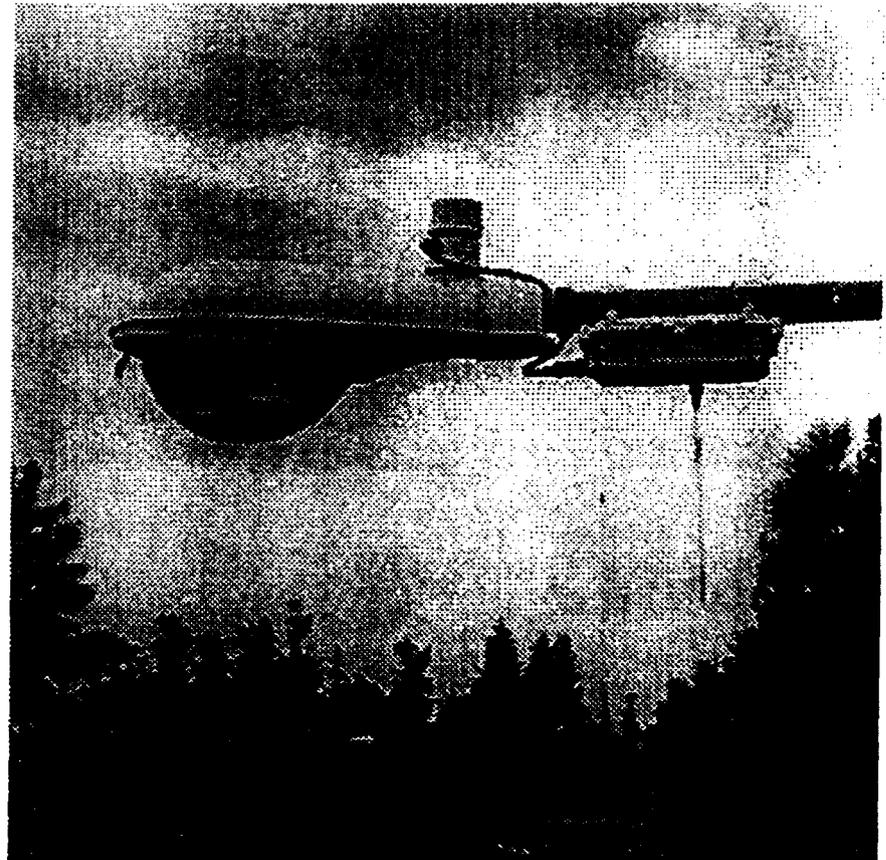
# *Ricochet Frequencies*



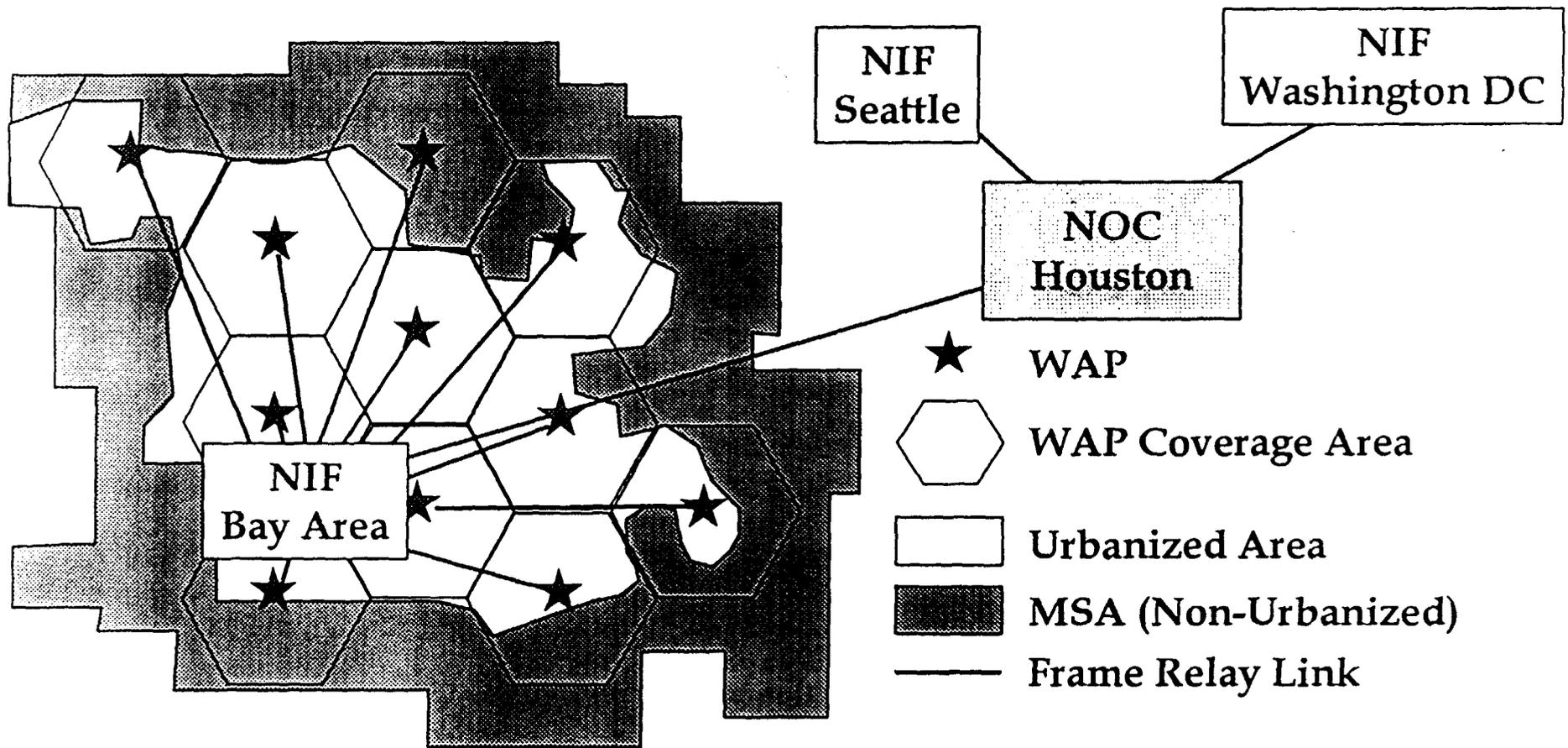
# *The Network*

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- 100% digital packet-switched network
- Network radios installed in clusters of 100+
- Wired access points (WAPs) on buildings
- Frequency hopping, spread spectrum
- Proprietary architecture
- 20 patents



# *Clusters Are Interconnected With High-Speed Frame Relay*



# *Present and Planned Ricochet Coverage*

---

## ***Metropolitan Area Networks***

- San Francisco Bay Area (1995)
- Seattle (1996)
- Washington, DC (1996)
- Los Angeles (begin 1997)
- New York (begin 1998)

***Major Airports*** (National, Seattle, SFO, etc.)

***Corporate Gateways*** (Cisco, Sun, etc.)

***Universities*** (Stanford, GWU, Miami, Oregon State, etc.)



# *What Metricom Requires*

---

- Adequate spectrum
  - High speed
  - Capacity
- Unlicensed, shared spectrum
  - Consumers benefit
  - No auctions, fees for unlicensed, shared spectrum
- Usable transmit power
  - Community-wide coverage
  - 24 hour, not 6-8 hour resource

# *What Metricom Requires (Cont'd)*

---

- Simple rules
  - Intelligent networks, not etiquettes
  - Enables engineers to invent best solutions
- Reasonable spectrum occupants
  - Suited for operating in shared spectrum
- Regulatory stability
  - Commitment to unlicensed, shared spectrum
- Access to rights-of-way and antenna siting

# *Metricom Priorities:*

## *Categories of Concern*

---

- To maintain the integrity of Metricom's present unlicensed spectrum allocations.
- To obtain additional unlicensed and licensed spectrum allocations for Metricom's growth and its new services.
- To promote simple, flexible and fair technical rules that will encourage technology and marketplace forces to replace existing regulation.
- To promote a favorable regulatory environment for Metricom's business plan.

# *Metricom Priorities: Categories and Proceedings*

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<b>Unlicensed Spectrum <u>Integrity</u></b>	<b>Additional Spectrum <u>Opportunities</u></b>	<b>Simple, Flexible <u>Rules</u></b>	<b>Favorable Regulatory <u>Environment</u></b>
<ul style="list-style-type: none"> <li>• LMS Reconsideration</li> <li>• Amateur Spread Spectrum NPRM</li> <li>• Part 15 Statutory Framework</li> </ul>	<ul style="list-style-type: none"> <li>• Part 15 Statutory Framework</li> <li>• No Etiquettes</li> <li>• 220 MHz</li> <li>• WCS</li> </ul>	<ul style="list-style-type: none"> <li>• No Etiquettes</li> <li>• 220 MHz</li> <li>• WCS</li> </ul>	<ul style="list-style-type: none"> <li>• Rights-of-Way and Antenna Siting</li> <li>• OET Reorg.</li> </ul>



# *Metricom Priorities:*

## *LMS Reconsideration*

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Authorization of Multilateration-LMS introduced a service not designed for sharing into the 902-928 MHz band and therefore created a threat to Part 15 operations in the band.

- Part 15 height threshold.
- Wideband LMS forward links.
- Field testing of LMS systems.
- Interpretation of Part 15 last links.
- Treatment of mobile Part 15 devices.
- Permitted interconnect and messaging for LMS.