

Metricom Priorities:

Amateur Spread Spectrum NPRM

NPRM proposes authorization for unlimited spread spectrum operations for amateurs that could make Part 15 bands unusable.

- Part 15 equipment is commercially available that could be modified to run at amateur power levels (up to 100 watts and unlimited EIRP).
- Such amateur operations could cause insurmountable interference to Part 15 use of the bands.
- Proposed rule could be extremely damaging to public confidence in the Part 15 community.
- Interested amateur community deeply split.
- Could interfere with certain ISM equipment.

Metricom Priorities:

Part 15 Statutory Framework

Some have asserted that Part 15 rules go beyond the Commission's statutory authority to authorize operation of at least some unlicensed devices and services potentially threatening Part 15 operations entirely.

- Metricom and other Part 15 companies require solid, consistent assurance of stability for continued authorization of Part 15 operations in unlicensed bands.

Metricom Priorities:

No Etiquettes

The Commission approach to etiquettes in U-NII and Above 40 GHz was proper. The approach used in unlicensed PCS was not.

- Etiquettes presuppose specific equipment design and applications.
- The industry consensus process as implemented by WINForum was seriously flawed.

Metricom Priorities:

220 MHz Rules

Metricom purchased an option to acquire a nationwide 220 MHz license contingent on rules that expand permitted uses of the spectrum.

- Metricom filed PFR requesting replacement of Phase I licensee construction benchmarks with Phase II construction benchmarks.
- PFR proposal would permit Phase I licensees to provide competitive and innovative services like Phase II licensees and install equipment to provide such services instead of having to install useless equipment solely to comply with construction deadlines.



Metricom Priorities:

Right-of-Way and Antenna Siting

Among the most difficult, time-consuming challenges facing Metricom is obtaining right-of-way and antenna sites with reasonable effort at reasonable cost.

- Any provisions the Commission makes that enable access must include unlicensed services.

Metricom Priorities:

Wireless Communications Service

Metricom won several WCS licenses in auction.

- Metricom bid for spectrum based on the WCS order.
- Extending sunset date for wireless cable equipment as requested in WCA PFR alters basis upon which WCS spectrum was auctioned and is unacceptable.

Other Concerns:

CMRS Flexibility

Metricom believes that Ricochet service is CMRS.

- We have asked the Commission to validate this conclusion.
- Commission has previously ruled that unlicensed devices are not CMRS but was silent on unlicensed services.

Other Concerns:

White Paper

Metricom is concerned that the White Paper on unlicensed spectrum and the industry that makes use of it has been abandoned.

- Sales of unlicensed products and services are forecast to increase to \$2.13 billion by 2000 representing approximately 7.5 million devices.
- The Commission needs to devote resources to understand an industry of this size.
- Without such an effort, the public interest in this spectrum and its many uses may be overlooked.

Other Concerns

OET Reorganization

Metricom is concerned about proposals to eliminate the OET.

- Central source of technical expertise, analysis and coordination within the FCC.
- Advocate of emerging technologies that lead to more efficient and creative ways to utilize the RF spectrum.
- Unlicensed industry exists only as a result of OET advocacy.