

# *Metricom Priorities:*

## *Right-of-Way and Antenna Siting*

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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*

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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*

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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*

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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*

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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.