



Ex Parte

May 4, 2015

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: GN Docket Nos. 14-166 & 12-268

Dear Secretary Dortch

On April 21, 2015, Adeunis RF And Adeunis-NA, Inc. (“Adeunis”), represented by Pascal Saguin, Bertrand Million and the undersigned met with Commission staff (in person and via telephone conference) in the above-designated dockets. Representing Commission staff were Julius Knapp, Paul Murray, Chad Breckenridge, Simon Banyai, Chris Helzer, Blaise Scinto, John Schauble, Chris Andes, Steve Buenzou, Serey Thai, Hugh Van Tuyl, Geri Matise and Ira Keltz.

During this meeting, Commission staff indicated other parties participating in the above-numbered proceedings have claimed wireless microphones, which might include those manufactured by Adeunis, are causing interference with Multiple Address Service (“MAS”) licenses. For example, Xcel Energy Services, Inc. (“Xcel”) commented that, as a large operator of utilities and an MAS licensee, it fears interference from wireless microphones and, therefore, opposes their use as Low Power Auxiliary Services (“LPAS”) devices in the 941-944 MHz and 952-960 MHz bands. Xcel also urges power limitations on, and geographic restrictions for, wireless microphones in such bands.¹

In its reply comments, Adeunis noted that Xcel failed to support its claims with any evidence.² However, because of the Commission Staff’s recent inquiry, Adeunis conducted additional analysis of the actual effect of the use of Adeunis’ Vokkero[®] wireless microphones on microwave licenses in the bands under discussion, including MAS licenses.

Significantly, most wireless microphone systems, including the Vokkero radios, are low power emitters, i.e., less than 250 mW. Such low power emissions are simply not likely to interfere with any microwave transmission or reception. In the case of the Vokkero system, this conclusion is reinforced because the microphones are used inside stadiums (both open air and domed) as well as indoor arenas. The structures themselves limit microphone emissions.³

¹ Xcel Comments, at 3. Xcel’s position was supported by the Utilities Telecom Council (“UTC”), a trade association, in its reply comments at 3-4.

² Adeunis Reply Comments, at 2-3.

³ See also, File No. 0772-EX-ST-2013, WG9XXH, Exhibit B, and File No. 0630-EX-ST-2014, WH9XSZ, Exhibit C.

Also, the Vokkero radios are worn by individuals in holders next to their bodies. Due to the “body effect,” there is as much as 20 dB of RF energy absorption. Vokkero radio transmitters are duty cycle efficient, such that only a small beacon is transmitted when no one is speaking. For example, football officials are silent for most of the game, and there are few RF emissions when officials are not talking with each other, while using Adeunis’ wireless microphones. Since the Vokkero radios using TDMA technology, the duty cycle when an official speaks is less than 15%. In sum, the facts show the use of Vokkero radios (and other similar TDMA devices) simply present negligible risk of interference to microwave users. Both can and should be permitted in the 941-960 MHz band.

Please include these materials in the Commission record for each proceeding.

If you should have any questions or require additional information, please contact the undersigned at (703) 714-1316 or rhj@commlawgroup.com.

Respectfully Submitted,



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cc: Julius Knapp Paul Murray
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