



M. Anne Swanson  
T: +1 202 776 2534  
aswanson@cooley.com

SUBMITTED ELECTRONICALLY

May 14, 2015

Marlene H. Dortch, Esquire  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, Dc 20554

**RE: Notice of Ex Parte Presentation  
(WT Docket Nos. 10-119, 98-182; RM-9222, RM-10762, and RM-10844)**

Dear Ms. Dortch:

On May 14, 2015, the following individuals met with members of the Commission staff copied on this letter regarding issues in the above-referenced dockets: Joe Schrick, Hank Straub, and Jimmy Kummer of Garmin International, Inc. ("Garmin") (by phone) and Jason E. Rademacher and me (in person) as counsel for Garmin.

Garmin discussed the comments and reply comments it has filed in the above-referenced dockets and provided the attached summary of outstanding issues. Garmin also provided the Commission staff with a brief demonstration of some of the functions of the RINO655t, which are summarized in the attached screenshots regarding the product from Garmin's website. Copies of the screen shots also were provided to the meeting participants.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed for inclusion in each of the above-referenced dockets. Copies of this letter are being provided to all Commission employees who attended the meeting. If you have any questions about this filing, please contact me.

Very truly yours,

M. Anne Swanson

cc (via email): Mr. Scot Stone  
Mr. Tom Derenge  
Mr. Sean T. Conway

**GARMIN BELIEVES IT IS ESSENTIAL THAT THE FCC ADOPT CERTAIN PROVISIONS IN STREAMLINING THE PERSONAL RADIO SERVICE RULES (WT Dkt. Nos. 10-119 and 98-182; RM-9222, RM-10762, RM-10844)**

**May 14, 2015**

- I. The Rulemaking Record Conclusively Supports Allowing GPS and Text Data Transmissions on GMRS Channels
- For a dozen years, the FCC has allowed the transmission of GPS information and text messages on certain FRS channels; the safety of life and other benefits of such transmissions (*e.g.*, locating lost individuals) should be extended by rule to GMRS, which has a wider range.
  - Pursuant to waivers, Garmin since 2004 has sold over 600,000 GPS-enabled devices that operate over GMRS frequencies, and no interference has been reported.
  - Given the clear public interest benefits, the FCC should codify its proposal to permit the transmission over GMRS frequencies of GPS information and text messages using emission type F2D in digital bursts of not more than one second.
- II. The FCC Should Confirm Its Existing Policy of Allowing FRS/GMRS Combination Radios
- Combination FRS/GMRS radios are very popular with public safety personnel and with consumers
  - The record is devoid of any evidence that indicates FRS/GMRS combination radios cause interference to GMRS or other services
  - If the Commission has eligibility concerns related to alien or other ownership issues involving particular services, the FCC should address that problem by service-specific rules, rather than prohibiting FRS/GMRS combination radios.
- III. The FCC Should Not Cap the Permissible Power Level of Portable GMRS Devices at 2 Watts ERP
- Users, particularly search-and-rescue personnel, absolutely need the stronger, more reliable, and higher quality signals produced by very popular lines of 5-watt GMRS devices; lower power levels would degrade service when maintaining communication is crucial.
  - Garmin's own SAR tests on 5-watt devices have not shown any unacceptable radiation levels, which is to be expected given that the devices operate with short communications intervals and utilize relatively low frequencies
  - Garmin does not oppose future SAR testing of such devices

IV. Narrowbanding GMRS Channels Would Diminish Service Quality Without Any Accompanying Public Interest Benefit

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- The Commission's narrowbanding proposal is not accompanied by any articulated need for or evidence supporting the proposal, such as concerns over reducing interference
- Narrowbanding would weaken GMRS and make it a less robust service
- To ensure signal quality and reliability, the FCC should clarify that data transmissions using the F2D emissions type have an authorized bandwidth of 20 kHz, as voice already does; the FCC should adopt a uniform 20 kHz authorized bandwidth for GMRS data and voice

V. The FCC Needs To Address Confusion Regarding Analog Voice Scrambling

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- Analog voice scrambling is not "coding" and does not make communications "secret;" the FCC should re-evaluate past KDBI pronouncements equating the two features
- If the Commission decides to prohibit analog voice scrambling, it should "grandfather" existing units and provide that any prohibition on marketing GRMS or FRS radios with analog voice scrambling does not become effective until at least 12 months following the new rule's finality.



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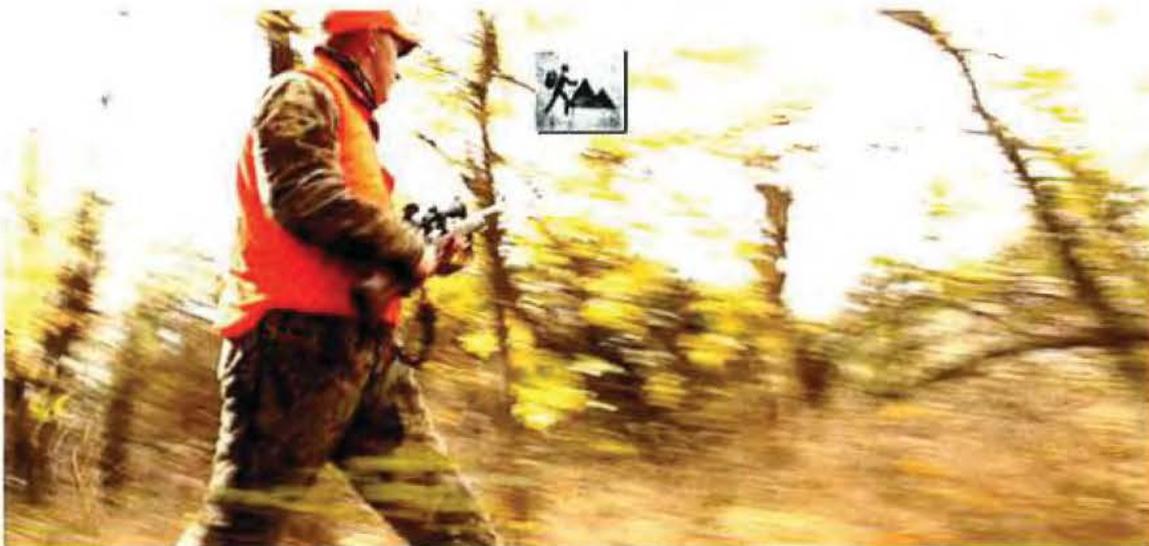
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With a 5 W FRS/GMRS radio, 2.6" glove-friendly color touchscreen GPS with preloaded [TOPO 100K](#) maps, barometric altimeter, 3-axis electronic compass, NOAA weather radio and 5-megapixel camera, Rino 655t is a jack-of-all-trades.



### Pinpoint Your Position

With its high-sensitivity GPS receiver and quad helix antenna, Rino 655t quickly finds your position and maintains it – even in heavy cover. Plus, a built-in barometric altimeter and 3-axis compass make it easy to get your bearings without the need to hold it level.

### See Your Surroundings

The device comes preloaded with TOPO 100K maps, which includes coverage of the full U.S. Adding more maps is easy with Garmin's wide array of detailed topographic, marine and road maps. With its microSD™ card slot, Rino 655t lets you load [TOPO U.S. 24K](#) maps and hit the trail or plug in [BlueChart® g2](#) preloaded cards for a great day on the water. The device also supports [BirdsEye Satellite Imagery](#) (subscription required), that lets you download satellite images to your device and integrate them with your maps. In addition, Rino 655t is compatible with [Custom Maps](#), free software that transforms paper and electronic maps into downloadable maps for your device.



### Find Your Friends

Rino 655t's unique Position Reporting capability lets you send your exact location to other Rino users so they can see it on their map page. Plus, improved audio performance means it's easy to communicate with any other conventional FRS/GMRS radio in the area. It can be useful in an emergency, or just a handy way to keep tabs on your hunting party, hiking partner, family or friends.

### Stay in Touch

With plenty of transmit power, Rino 655t also lets you send unit-to-unit text messages to other Rino users in your area – it's ideal for loud or windy conditions, or just when you don't want to disturb the wildlife. It also lets you share your waypoints, tracks, routes and geocaches wirelessly with other compatible Garmin handheld devices.

### Document Your Journey

With Rino 655t's built-in 5-megapixel autofocus camera, you'll be able to capture the highlights of your outings. Each photo is automatically geotagged with the location of where it was taken, allowing you – or those you share your photos with – to easily navigate back to that spot in the future.

#### Related

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## View Weather Watches and Warnings

For added safety, Rino 655t features a built-in NOAA weather radio that can help you avoid hazardous weather. The radio supports Specific Area Message Encoding, which allows you to see National Weather Service warnings and watches displayed county-by-county on the map screen.

## Plan Your Next Trip

Take charge of your next adventure with [BaseCamp™](#), software that lets you view and organize maps, waypoints, routes, and tracks. This free trip-planning software even allows you to create [Garmin Adventures](#) that you can share with friends, family or fellow explorers. BaseCamp displays topographic map data in 2-D or 3-D on your computer screen, including contour lines and elevation profiles. It also can transfer an unlimited amount of satellite images to your device when paired with a BirdsEye Satellite Imagery subscription.

## Turn Your Computer Into a Base Station

The all-new BaseStation lets you turn your laptop (loaded with BaseCamp) into a field command center for tracking multiple Rino units. View real-time GPS information on the larger display of your computer with Rino serving as a router/antenna. And because it's Garmin GPS-based, safer, more effective search and rescue operations are in your control, even where Internet and cell phone service isn't.



### Recently Viewed



**Rino® 610**

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