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SUBMITTED ELECTRONICALLY

May 29, 2015

Marlene H. Dortch
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 27, 2015, the following individuals and I met by telephone 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"), and Jason E. Rademacher (of this firm, as counsel for Garmin).

In the meeting, Garmin's representatives stressed the need for rules that will permit device manufacturers to continue providing the public with GMRS radios that transmit at 5 watts of power. Such devices, Garmin noted, are essential to the relatively long-range reception needs of users, including search-and-rescue as well as recreational users. The meeting participants also discussed the potential benefits of authorizing data transmissions on GMRS-only radios with detachable antennas, which could further improve the data coverage area of such radios. Garmin expressed support for rules that would permit FRS radios that would operate at up to 2 watts of power. Garmin indicated that these lower-powered FRS devices could be attractive to recreational users who have less need for higher-powered devices.

Garmin also emphasized the need for clarity regarding location data transmissions on Part 95 radios. Garmin explained that manufacturers should be allowed to design radios that permit periodic data transmissions consistent with waivers previously granted to Garmin, and that such data transmissions should be permitted to use the same 20 kHz bandwidth that voice transmissions may currently utilize. The increased bandwidth (under its current waiver, Garmin is permitted to transmit data bursts using only 12.5 kHz of bandwidth) would improve the quality and reliability of data transmissions, a feature that has become important to users of these devices. Given the importance of the accurate transmission of location data for those who utilize these radios for public safety and personal purposes, Garmin urged adoption of these proposals.

In addition, Garmin also reiterated the importance of ensuring that any changes to the existing rules provide device manufacturers like Garmin with sufficient lead time to accommodate product development cycles common in the industry.

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



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by email to all Commission employees who attended the meeting. If you have any questions about this filing, please contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "M. Anne Swanson", with a long horizontal flourish extending to the right.

M. Anne Swanson
Counsel to Garmin

cc (via email): Mr. Roger Noel
Mr. Tom Derenge
Ms. Becky Schwartz
Mr. Ryan Thompson
Mr. Sean T. Conway