



1200 Nineteenth Street, NW
Suite 500
Washington, DC 20036

Telephone: (202) 467-6900
Fax: (202) 467-6910
www.wcsr.com

Gregg P. Skall
Direct Dial: 202-857-4441
Direct Fax: 202-261-0041
E-mail: GSkall@wcsr.com

June 11, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
Room TW B204
The Portals
445 12th Street SW
Washington, DC 20554

Re: Notice of Ex Parte WT Docket No. 10-119

Dear Ms. Dortch:

This letter is submitted pursuant to Section 1.1206 of the Commission's rules to disclose the communications made in the above referenced proceedings on behalf of Uniden America Corporation ("Uniden"). On Tuesday, June 9, 2015, Paul Opitz of Uniden and I met with Tom Derenge, Scot Stone, Sean T. Conway and Ryan Thompson of the Wireless Telecommunications Bureau to discuss rules changes to the FRS, GMRS, CB, and other services.

The discussion included Uniden's proposal to redraw the FRS to include all 22 channels currently used in mixed-service radios with the requirement going forward that new FRS:

1. Limit power to 2 watts ERP on all channels;
2. Limit occupied bandwidth to 12.5 kHz on all channels;
3. Operate from a non-removable antenna;
4. Allow for voice inversion mode; and
5. Make all 22 channels license-by-rule.

Uniden believes these changes would unify the technical standards across all channels, and also reduce consumer confusion and non-compliance. An individual user license should be required for the use of any radio capable of more than 2W ERP, channels greater than 12.5 kHz, repeater operation, or a removable antenna and should be classified as GMRS. Thus an individual user license should be required for use of any radios that do not comply with the FRS rules for these or any other reasons. Once adopted, the industry should be allowed ample time to new technical changes, which we believe to be about 2 years.

Uniden supports Garmin's request to allow a data burst to be included along with, preceding, or following voice communications for the purpose of transmitting location and/or other short message information in either the GMRS or the FRS. However, to ensure that data does not create unwanted channel congestion, such bursts should be required to be either manually triggered or be automatically triggered by a specific event (i.e. change in location triggering), and such automated messages must be limited to no more frequently than once every 2 minutes and no more than 5 seconds in duration.

In Uniden's experience, consumers rely heavily on the range rating as a "headline number." Accordingly, Uniden believes it would be a significant consumer benefit and would welcome uniform testing standards for radio range, the representation of which would be made a part of the radio certification for use by all FRS device manufacturers and marketers.

Should there be additional questions regarding this submission, kindly contact the undersigned.

Sincerely,

WOMBLE CARLYLE SANDRIDGE & RICE
A Limited Liability Partnership



Gregg P. Skall
Counsel to Uniden America Corporation