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Via Electronic Filing

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

Re: WT Docket Nos. 10-119 & 98-182; RM-10762 & RM-10844 Report of Oral *Ex Parte* Communication

Dear Ms. Dortch:

On March 14, 2016, the undersigned, on behalf of **Midland Radio Corporation** (“Midland”), made an **oral *ex parte*** presentation relating to the above-captioned proceedings to the following staff of the **Wireless Telecommunications Bureau**: Jean Kiddoo, Deputy Bureau Chief; Matthew T. Pearl, Legal Advisor, Office of the Bureau Chief; and Thomas Derenge, Deputy Chief, Mobility Division. The purpose of the meeting was to discuss the pending Part 95 Notice of Proposed Rulemaking.

The following points were discussed:

- We reiterated the points made in Midland’s previously-filed written Reply Comments, including in particular that reducing the GMRS power limit to 2 watts would not meet consumer needs, wireless hands-free microphones should be permitted in CB radios, and

modern technology should make it possible to allow radio units that combine multiple radio services.¹

- While the use of cellphone for one-to-one communications has become nearly universal, at least in populated areas, there is an ongoing need for radios that allow one person to communicate simultaneously with several recipients, as well as both one-to-one and one-to-several communications in rural areas where cellphone service is poor or non-existent. Examples include communications among vehicles traveling together in a caravan and vehicles deployed on large ranches, where 2-watt radios are not sufficient to cover the distances over which messages are sent.
- The FCC should retain the distinction between mobile and portable radios, including allowing sufficient power for mobile units that use external power sources. Licensed GMRS should not be treated differently from VHF marine radios, for example, which operate at higher power.
- There are continuing valid applications for both the simple, lower-power FRS and the higher power GMRS. There is also public demand for combined FRS/GMRS radios, as well as radios combining CB and VHF-FM with GMRS in a single unit. Cognitive radio technologies have improved in recent years and can be used to avoid improper use of various frequencies and radio services.
- Should the Commission modify rules in a way that effects equipment certification and marketing, it should provide reasonable and customary timelines, of up to two years, for manufacturers to meet new requirements, so that products developed in good faith may continue to be sold for a reasonable amount of time and used throughout their reasonable life expectancy.

Please direct any questions to the undersigned.

Respectfully submitted,

/s/

Peter Tannenwald

Laura A. Stefani

Counsel for Midland Radio Corporation

cc: (by e-mail)
Jean Kiddoo, Deputy Chief
Matthew T. Pearl, Legal Advisor
Thomas Derenge, Deputy Division Chief

¹ Reply Comments of Midland Radio Corporation, *Review of the Commission's Part 95 Personal Radio Service Rules*, Notice of Proposed Rulemaking, WT Docket No. 10-119 *et al.* (filed Sept. 20, 2010).