Datascope.

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September 15, 1999

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Commission Secretary
Magalie Roman Salas, Office of Secretary
Federal Communications Commission
The Portals
445 12th Street SW, Room TW-A325
Washington DC 20554

RE: Wireless Medical Telemetry Service (ET Docket 99-255)

Dear Ms. Salas:

Datascope Corporation applauds the Commission for its adoption of a Notice of Proposed Rulemaking that will inevitably provide the healthcare industry an important step in securing a blanket license on an interference-protected basis. We are enthusiastic and eager to support this landmark ruling.

If the past is any indication, Wireless Medical Telemetry Service ("WMTS") will be embraced and become a standard technology that speeds patient recovery, reduces healthcare costs, and improves patient safety. Notwithstanding, with all due respect to the FCC who has done the proper due diligence, we agree with the American Hospital Association Medical Telemetry Taskforce that it will take manufactures approximately three to four years to agree on a wireless protocol, to develop and market devices for these proposed frequencies, and for hospitals who are managing their costs to procure these devices. We also believe that any device already operating can continue to operate at the users' own risk and if any device that is lawfully manufactured and is within the transition deadline should be "grandfathered" in view of cost management in a highly cost sensitive industry.

We fully support American Hospital Association ("AHA") in its recommendation that it serve as the frequency coordinator for WMTS, subject to its appointment by the Commission. The AHA will be able to satisfy each of the criteria mandated by the Commission for certified frequency coordinators in other services, including providing coordination services on a non-discriminatory basis; processing applications in order of receipt; handling post-licensing conflicts; maintaining reasonable and uniform fees; establishing a single point of contact nationally; and facilitating the use of new technologies. We likewise believe hospitals, healthcare providers, and other manufactures with AHA's guidance will be able to develop and agree on a wireless protocol based on advanced digital transmission techniques because an uncoordinated mix of techniques will spawn interference and prevent interoperability. Furthermore, the bandwidth proposed is adequate for the near term anticipated needs (6 MHz) but must be used effectively to meet these needs. The modulation and protocol used for WMTS is key to effective use of this protected resource.

In addition, we need the FCC to ensure that the vast majority of the healthcare industry users can take full advantage of the benefits that the AHA Medical Telemetry Taskforce proposed. These benefits include:

- Patient safety: The new WMTS needs to be of sufficient power, as originally proposed by the AHA Task Force, to ensure more reliable data transmission with less drop out. Patient safety is at risk if reliable communications can not be established and maintained. We feel that the power level currently permitted under Part 15 is insufficient to achieve the necessary transmission reliability in a hospital environment as well as allow for a cost effective solution. The need for facility-wide installations has grown significantly in the last several years further degrading system performance. The AHA Task Force proposed power level of 370 mV/m for the 608-614 MHz band would enable us to achieve the necessary transmission reliability for critical patient information.

- Cost management: The AHA Task Force recommended power levels would ultimately enable larger systems covering a greater area without significant decrease in the system signal to noise ratio (SNR). Greater distance between antennas/receivers will result in a reduction of the total equipment required and reduce the complexity of installation within the hospital. This will allow the cost of a telemetry system to be reduced while, at the same time, increasing its overall performance.

We commend the Commission, you, your staff, and the other offices for addressing this issue and FCC's continuing partnership with the healthcare industry. Once more, thank you for the effort you have all made towards providing a solution to our ultimate concerns, which is patient safety.

Sincerely,

Robert Terranova
Director of Engineering
Datascope Corporation
Patient Monitoring Division