



Cerner Corporation
2800 Rockcreek Parkway
Kansas City, Missouri
64117-2551
(816) 221-1024
(816) 474-1742 Fax

RECEIVED
OCT 7 1999

Magalié Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Counter TWA 325
Washington, D.C. 20554

September 30, 1999

Re: **Amendment of Part 15 of the Commission's Rules
Regarding Spread Spectrum Devices
Notice of Proposed Rulemaking
ET Docket No. 99-231**

Dear Ms. Salas,

Cerner Corporation endorses the proposals set out in the above-referenced Notice of Proposed Rulemaking. Cerner Corporation strongly supports the Commission's initiative to facilitate increased innovation and competition in the on-going development and use of broadband spread spectrum technologies at 2.4 GHz.

Cerner is one of the largest suppliers of Healthcare software in the industry. Our software currently supports wireless point of care devices, which allow caregivers to update and access patient records at the bedside. These devices can raise the effectiveness of a caregiver and allow more time to be spent with their patient, increasing the quality of care. In healthcare, frequency hopping is the de-facto standard and is installed in over 1,000 hospitals and healthcare institutions nationwide. Our software and the associated wireless mobile devices will benefit greatly by the increase in speed. A higher data rate would allow caregivers to receive information quicker, further increasing the quality and time spent with the patients.

Frequency hopping spread spectrum technology is proven and tailor-made for the healthcare industry. They are quite resistant to interference in this unlicensed communications band, which also is shared with such ISM devices as the ubiquitous microwave oven. They also consume very little power, which is a critical consideration for mobile devices in healthcare. Overall, frequency hopping technologies provide excellent cost/performance value.

Adoption of the Commission's proposal will mean that frequency hopping systems can more fairly access the available frequencies in the 2.4 GHz band. They will also be able to deliver higher data rates, while being backwardly compatible with the installed base of existing, more narrow-band systems. Higher data rates made possible by the Commission's proposal will enable our company and our customers to realize additional benefits, such as faster file transfers, speedier Internet access, and enhanced multimedia experiences. Moreover, frequency hopping systems that comply with the proposed rules will not result in additional interference to existing users of the 2.4 GHz band. This point is very important to us because of our installed base in this band.

For all these reasons, we urge quick adoption of the Commission's proposal in this proceeding.

Respectfully submitted,

Steve Crooks
Cerner Corporation

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