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Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

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Re.: Notice of Proposed Rulemaking

In the Matter of

Year 2000 Biennial Regulatory Review – )  
Amendment of Part 22 of the )  
Commission's Rules to Modify or )  
Eliminate Outdated Rules Affecting )  
the Cellular Radiotelephone Service )  
and other Commercial Mobile Radio )  
Services )

WT Docket No. 01-108  
FCC 01-153

20 June 2001

Greetings:

Please accept the enclosed comments on the Notice of Proposed Rulemaking in reference to the above captioned subject.

Regards,



Alan Dixon  
CORES FRN 0003-3350-56

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Contributing Editor  
Popular Communications

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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**COMMENTS TO NOTICE OF PROPOSED RULEMAKING**

GREETINGS:

Gentlemen and ladies, I will dispense with the customary citational, footnoted style of commenting, and instead speak in plain, obvious truths. I therefore beg your kind indulgence herein. Additionally, I will draw on my years of experience in engineering first and second generation cellular networks and subscriber equipment.

We need to preserve the nation’s cellular system analog capability with AMPS-compatible wireless telephones, and with subsequent first-generation mobile wireless telephones and portable handsets. AMPS, or analog technology network capability *must remain coprimary* right along side of cellular carriers’ alternate digital technologies.

Why? The United States’ wireless telephone system is actually a patchwork of systems operating disparate technologies that often requires different subscriber equipment on different systems. It is a well-known fact that there are three different digital wireless telephone transmission standards in widespread use in the US: TDMA, CDMA, and GSM. But we do have one universal standard, that is, one true *standard* that allows

wireless telephone subscribers who so choose, to roam seamlessly anywhere that there is coverage in the nation. Yes, the simple truth is that **cellular analog service has long evolved into the *defacto* roaming standard for the entire nation.** Indeed, it has become the nearly universal roaming standard for the entire Western Hemisphere. Again, the existing analog cellular system infrastructure *must remain intact* for continued seamless wireless telephone service and ubiquitous coverage across the US.

Keeping analog service coprimary under Part 22 (47 CFR Part 22) provides many customers with a real choice. **If analog service is not kept coprimary, cellular carriers have little incentive to continue this service in favor of higher traffic capacity digital technologies. This is explicitly illustrated among 1900 MHz Personal Communications Services (PCS) carriers.** To my knowledge, **not one PCS carrier has chosen analog technology.** Analog cellular service will very likely become unavailable in many markets.

So, what would such a loss mean to consumers? First, cellular service customers in most areas of the country have an instant choice of two “competing” technologies at either the A band or B band cellular carrier in their locality. That choice would be lost, and the customer loses. Second, the customer has a choice of either a hand-portable wireless telephone, or a higher-powered mobile vehicular telephone. My recent cursory searches for a mobile (as opposed to a hand-portable) cellular unit came up rather empty for the digital technologies. I found *none* available for CDMA, even with my connections in the wireless industry. I did actually see a few different models of TDMA vehicular mobiles in laboratory use, but was unable to easily locate any in the consumer marketplace. On the other hand, anyone can walk into a RadioShack® store and

purchase a true 3-watt unit (catalog number 17-1218) in stock, with a separate transceiver box and a full size handset that actually fits the user's face and hands. So again, the loss of analog cellular service means the loss of consumer choice as to mobile versus hand-portable subscriber units. Hard-wired mobile units are useful in cases where the cellular subscriber wants to assure that the phone will remain in the vehicle and not be lost or forgotten! Vehicular mobile phones are especially important for those who wish to operate a mobile phone safely while driving, since such units are specifically designed for in-vehicle use. They are also important to those consumers who fear ill health effects of electromagnetic radiation, since the radiating element of the antenna is placed away from the user's head and body. Additionally, vehicular mobile cellular phones offer 3000 milliwatts (3 watts) of transmission power as compared to the paltry 600 mW produced by hand-portable cellular phones. This additional power is highly useful in fringe coverage areas and on rural highways. Apparently, **market forces have failed to give consumers the choice of having vehicular mobile units for the newer digital technologies.** If analog cellular service disappears, so does having vehicular mobile telephones and all of their advantages.

How important is analog cellular service? Consider the fact that the leading industry association representing the cellular industry has recently stated at its Internet Web site that **over fifty percent of wireless telephone subscribers still use analog cellular phones.** That's right—the Cellular Telephone and Internet Association (CTIA) tells us so. <<http://www.wow-com.com/consumer/faq/articles.cfm?ID=97#two>> The US is nowhere near digital saturation. The cellular industry so often speaks of “migrating” cellular subscribers to digital technology. The very thought of this evokes mental images

of wartime refugees leaving their homeland with whatever meager possessions they can carry on their backs. This is not a happy picture, and as a subscriber myself, the notion of being forcibly “migrated” to new telephone equipment and to new unwanted technology functionalities undermines my *choice* as a consumer. Surely, I am not alone among cellular customers who are happy with their cellular service, as is.

Still, there are other considerations for keeping analog cellular service coprimary. The emerging telematics industry has come to rely on the analog cellular service. It is widely known in the telematics industry that General Motors™ vehicles equipped with the OnStar® distress and safety system operate exclusively on the analog cellular network. Tens of thousands of newer vehicles already on the road, and many more to come will have their state-of-the-art telematics rendered useless if analog cellular service ceases. Also, there are a number of charitable programs to provide non-activated cellular phones to battered women who are or may be victims of domestic violence. These programs rely on donated used wireless telephones, nearly all of which are surely analog cellular handsets. A demise of analog cellular service would quickly put this group of people at risk of serious injury or death. A demise of analog cellular service would endanger anyone who picks up an older (or otherwise) cellular telephone and has every reason to believe that such person can successfully dial 911 in an emergency situation.

Simplicity is beautifully functional. My 3-watt analog cellular telephone is marvelously incapable of receiving unsolicited textual advertising *spam*. Thank you. I will further assert that the real beauty of analog cellular lies in what it *does not* do. Analog cellular *is* a *telephone* system. It *is not* a palmtop computer, a pager, a video game or a television receiver. Subscribers can simply speak, without paying for all the

extra “bells and whistles” found with emerging digital wireless technologies. The US has a mature analog infrastructure that *simply* works very well. FCC Chairman Powell has been noted in press reports as wishing to have a “hands-off” approach to telecommunications regulation. If this is true, then the Commission may do well to keep “hands-off” of existing Part 22 regulation requiring analog cellular service to remain a coprimary technology. Let us continue to give consumers real choices in cellular service technology. Let us keep our first-rate, fully functional analog cellular system in service and intact.

SUBMITTED

This day, 20 June 2001

Alan Dixon



Consumer

Veteran industry-recognized senior telecommunications engineer

Former Republican candidate for appointment to the FCC (1996)

Contributing Editor, *Popular Communications* magazine

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Former Member – TIA / EIA Standards Committee TR45-AHAG

CORES FRN    0003-3350-56