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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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MOBEX communications, inc.

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September 19, 2001

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Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Filing
ET Docket No. 00-221 and PR Docket No. 92-257

Dear Ms. Salas:

The following parties met on September 18, 2001 with Paul Margie of Commissioner Michael J. Copp's office: Paul vander Heyden of Mobex Communications, Inc.; Dennis C. Brown, attorney at law, and outside counsel for Mobex; and John Reardon and Minh Day of Mobex. The parties discussed ET Docket No. 00-221 and PR Docket No. 92-257. More specifically, the parties discussed reallocation of the 216-217 MHz and 218-219 MHz bands in the upcoming auction of the Automated Maritime Telecommunication System ("AMTS") spectrum.

The parties advocated the elevation of the Low Power Radio Service ("LPRS"), particularly users of assistive learning devices ("ALDs"), from secondary to primary status, and the reallocation of one-quarter megahertz of the LPRS spectrum to the AMTS. They further discussed the necessity of coupling the reallocated LPRS spectrum with a portion of the 218-219 MHz spectrum to facilitate two-way communications, that is, one channel block for receiving and the other block for transmitting. Finally, the parties demonstrated the financial incentives of including the reallocated spectrum in the upcoming AMTS white space auction. The attached document summarizes our proposed band assignment.

Kindly date-stamp the additional copy of this filing and return it in the envelope provided. Should there by any questions concerning this meeting, please contact the undersigned.

Respectfully submitted,

Minh Day

Minh Day
Law Clerk

Enclosure

cc: Paul Margie

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Block C Plan

Mobex has proposed to the FCC private Wireless staff that any future auction include the reinstatement of "Block C" (216.500-217.000 MHz) to AMTS service. This would provide a 50% increase in the spectrum available to AMTS services.

Current Band Assignments

LPRS	AMTS-LPRS	AMTS A&B	IVDS	AMTS A&B
216-216.750				

This would require some reorganization of two current bands, the 218-219 MHz service and the LPRS (216-216.750 MHz)

218-219 MHz band - Formerly the IVDS band, the spectrum has either been lightly used or lain entirely fallow, principally due to the total lack of any equipment or user application.

LPRS - This band is licensed by rule and caters to low power devices, principally for hearing impaired.

Mobex Proposed Band Assignments

LPRS	AMTS C	AMTS A&B	IVDS	AMTS C	AMTS A&B
216-216.500					

Mobex has proposed that it would be willing to relocate any current IVDS or 218-219 Mhz system operating in the Block C area to below 218.500. Thus the 218-219 MHz Service would retain 0.5 MHz of spectrum

Similarly we would propose to recrystal any authorized LPRS service currently operating. It is our view that this would not be unreasonable, as it includes only 250 Hz of spectrum (the area from 216.750-217.000 MHz is already set aside for AMTS by rule).

Both of the above services would have considerable spectrum to facilitate any applications that may be required, while at the same time returning Block C to productive use in the AMTS service.

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