Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
Review of Part 15 and Other Rules	)	ET Docket 01-278
Of the Commission Rules	)	RM-9375
	)	RM-10051

To: The Commission

Comments
Of Escort Incorporated and BEL Incorporated

These comments are written in reply to the Review of Part 15 and Other Parts of the Commission's Rules, ET Docket 01-278, RM-9375, RM-10051 (NPRM), proposed by the Federal Communications Commission.

The above Notice refers to interference to VSAT systems that are claimed to be caused from radar detectors, and questions whether radar detector emissions should be regulated by the Commission.

History

Since 1977, radar detectors have incorporated superheterodyne receiver technology to provide improved sensitivity and selectivity. The design has typically used an integrated antenna and waveguide mixer assembly. This combination has provided superior performance, while providing a product that is cost effective to the consumer. The first

local oscillator has typically been in the 11.2 to 11.7 GHz range. These products have been produced and sold for over 25 years. While most radar detectors oscillators are in this range, some newer generation local oscillators are higher in frequency, and can extend into the VSAT receive band of 11.7 to 12.2 GHz. In the past, radar detectors have not been regulated due to their classification as unintentional radiators above 960 MHz.

Summary of Alleged Interference

Recently, there have been complaints from the VSAT industry regarding alleged interference from radar detectors caused by radiation of this local oscillator. The VSAT systems receive band covers 11.7 to 12.2 GHz. The antennas are small, with low directivity and large, undesirable side lobes. Unexplained loss of the VSAT received signal has been blamed on radar detectors. It has been shown in a study that radar detectors exceed the Part 15 Class B limits, and from this observation it has been determined that radar detectors are at fault for these unexplained losses in the VSAT received signal. It has not been shown by the VSAT industry that radar detectors have caused all interruptions, or that radar detectors cause continuous degradation and signal loss to VSAT receivers. Even if stationary radar detectors could be proven to cause interference to VSAT receivers, radar detectors are mobile devices and should not be blamed for causing continuous interference.

Solution

There have been many proposals and recommendations offered as a solution to this potential problem. The first proposal is to have the radar detector industry redesign their products to meet Part 15 limits. First of all, there are currently no Part 15 limits specified above 960 MHz for unintentional radiators. To impose limits above 960 MHz would require all electronic devices to comply with these recommendations. This would place an enormous, unnecessary burden on the electronics industry, including the radar detector industry. This would have far reaching effects for all electronics manufacturers, and could create severe financial hardships for many of these manufacturers, including Escort and BEL. Also, since wavelengths are much smaller and path loss much higher at these frequencies, the proposed limits could be higher than the current Part15 limits. Devices at these frequencies are harder to shield and filter, which would make the product cost prohibitively high. A large increase in our product cost could jeopardize our company's financial stability.

Even though Escort Inc and Beltronics USA do not believe that ESCORT and BEL products are responsible for the alleged interference that the VSAT industry is experiencing, we propose a solution that will hopefully be suitable for all parties involved. We feel that the right solution is to allow the radar detector industry to vacate the 11.7 to 12.2 GHz band, and to move local oscillators back to the 11.2 to 11.7 GHz range, where millions of products have operated for over 25 years with no issues. This would eliminate all emissions from the VSAT receive band, and not place a severe financial burden on the radar detector and electronics industry. Moving the local

oscillator to 11.2 to 11.7 GHz is currently being studied, and will be accomplished by June 1, 2003.

We also would request that there would be no change in the Part 15 specification. This would cause an unnecessary hardship on all electronics manufacturers that operate, or have products that produce harmonics, in this band.

Respectfully,

Escort Incorporated
5440 West Chester Road
West Chester, Ohio 45069
513-870-8500

Beltronics USA
5442 West Chester road
West Chester, Ohio 45069
800-341-2288