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February 11, 2002

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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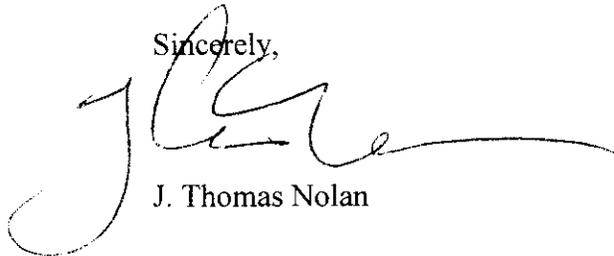
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: ET Docket No. 01-278/
RM-9375
RM-10051

Dear Mr. Caton:

Enclosed herewith is a diskette copy of the Comments of The ADEMCO Group filed in the above-referenced proceeding.

Sincerely,



J. Thomas Nolan

JTN/kd

Enclosure

cc: Qualex International

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

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In the matter of:)
)
Review of Part 15 and other Parts of the) ET Docket 01-278
Commission's Rules.) RM-9375
) RM-10051
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF THE ADEMCO GROUP

The ADEMCO Group ("ADEMCO"), by its attorneys, and pursuant to Section 1.415 of the Commission's Rules, hereby files its comments in the above-captioned proceeding.¹ In the two portions of the *NPRMO* of relevance to ADEMCO, the Commission proposes to (i) permit limited data transmission by remote control devices operating above 70 MHz; and (ii) allow advanced Radio Frequency Identification ("RFID") devices to operate at 425-435 MHz. As discussed more fully below, ADEMCO supports the Commission's proposal to remove the prohibition on data transmissions by remote control devices operating above 70 MHz. However, ADEMCO does not support the proposal to permit RFID devices to operate at 425-435 MHz until further study has been completed.

I. Introduction

ADEMCO, a division of Honeywell International, Inc., is the world's largest manufacturer of electronic security systems, and is a pioneer in the application of radio technology to the security industry. ADEMCO holds equipment authorizations for dozens of products operating at a frequency of 345 MHz. These products generally operate pursuant to Section 15.231(a) and (b) of the Commission's Rules, which set the maximum field strength

¹ See *Review of Part 15 and other Parts of the Commission's Rules, Notice of Proposed Rule Making and Order*, FCC 01-290 (rel. Oct. 15, 2001) ("*NPRMO*").

limits for devices, such as alarm transmitters, that need to transmit occasional high-priority signals for a short duration. These devices are subject to certain restrictions, set forth in Sections 15.231(a)(1) through (a)(4), which are designed to prevent over-occupation of the spectrum and thereby promote reliable communications.²

II. The Commission Should Remove the Prohibition on Data Transmissions Contained in Section 15.231(a).

The transmission of data for the purpose of communication, as opposed to control, is prohibited under Section 15.231(a). A device may transmit data for a limited duration, but only under the reduced field strength limits of Section 15.231(e). ADEMCO currently manufactures several devices that transmit data under the restrictions imposed by Section 15.231(e). These devices reduce power whenever they transmit data.

ADEMCO supports the Commission's proposal to remove the prohibition on the transmission of data from Section 15.231(a), provided that the restrictions in subsections 15.231(a)(1) through (a)(4) remain unchanged.³ Permitting data transmissions will offer a number of benefits to manufacturers and installers in the security industry. With only minimal additional data content, a new range of products will enable the design of improved security systems. Such products could feature comprehensive wireless displays and advanced user interfaces, better control capability, and improvements in the installation process. Other less visible improvements could provide a higher level of security to residential and business premises. ADEMCO could immediately take advantage of the higher field strength emission limits to improve the reliability and range of its current data transmission products.

² Subsections (a)(1) and (a)(2) require a device to cease transmitting within 5 seconds of activation. Subsection (a)(3) prohibits periodic transmissions, except for infrequent status polling operations. Subsection (a)(4) permits continuous operation in emergency conditions. 47 C.F.R. § 15.231(a)(1)-(a)(4).

³ See *NPRMO* at ¶¶ 15-18.

However, if the Commission removes the prohibition on data transmissions from Section 15.231(a), it should not relax the restrictions in Subsections (a)(1) through (a)(4) of Section 15.231. These timing restrictions are necessary to prevent proliferation of devices and over-occupation of the spectrum. This is important for one-way (transmit-only) fire, security, and safety-of-life applications, in which the probability of channel contention must be kept to a minimum. For the same reason, the Commission should maintain the duty cycle and timing restrictions of Section 15.231(e). In addition, the Commission should retain the peak power calculation method of Section 15.35(c). This measurement is critically important for one-way security applications, since it permits a reasonable power level for in-building communications while effectively enforcing a further duty cycle restriction at higher peak power levels.

III. The Commission Should Not Adopt Proposed Section 15.240 Until it Determines an Appropriate Duty Cycle for RFID Devices.

ADEMCO does not support the Commission's proposed new Section 15.240 as it currently is drafted, and urges further study before a rule is adopted.⁴ As drafted, the rule would permit RFID devices to operate in the 425-435 MHz band with very high duty cycles (120-second transmission duration with 10 seconds between transmissions). While ADEMCO's products do not operate in this band, the frequency of 433.92 MHz within the band is commonly used in residential security systems, automotive alarms, and remote keyless entry systems. ADEMCO is concerned that the high level of spectrum occupancy that would be permitted under this proposed rule could adversely affect the reliability of existing wireless security systems operating at 433.92 MHz. Since reliable operation is the touchstone of security monitoring, the fallout from the proposed rule could injure the entire wireless security industry. Accordingly, ADEMCO urges the Commission to further study the allowable duration for continuous

⁴ See *NPRMO* at ¶ 27; Proposed Section 15.240.

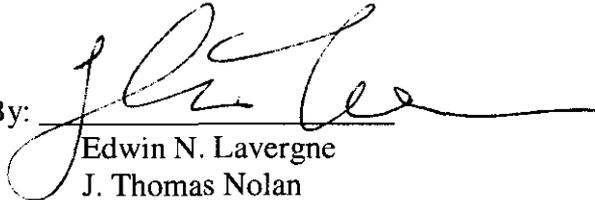
transmission systems. The proposed transmission duration appears excessive for the designated purpose, and should be quantitatively justified.

IV. Conclusion

For the foregoing reasons, the Commission should (i) permit data transmissions under Section 15.231(a) subject to the current restrictions contained in that rule; and (ii) refrain from authorizing RFID devices in the 425-435 MHz band under proposed Section 15.240 until it has determined an appropriate duty cycle that addresses the actual needs of the RFID industry.

Respectfully submitted,

THE ADEMCO GROUP

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February 12, 2002

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