

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

In the matter of:

Review of Part 15 and other Parts of the
Commission's Rules.

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)
) ET Docket 01-278
) RM-9375
) RM-10051
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

REPLY COMMENTS OF THE ADEMCO GROUP

The ADEMCO Group ("ADEMCO"), by its attorneys, hereby submits its reply comments in the above-captioned proceeding.¹ In its comments, ADEMCO expressed support for the Commission's proposal to remove the prohibition on data transmissions by remote control devices operating above 70 MHz. In addition, ADEMCO opposed the Commission's proposal to permit RFID devices to operate at 425-435 MHz until further technical study has been completed.

There is widespread support for the Commission's proposal to remove the prohibition on data transmissions by remote control devices operating pursuant to Section 15.231.² As Cisco Systems states, the "potential interference from devices authorized pursuant to Section 15.231(a) is a function of permitted field strength levels and the permitted transmission duration – not a

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¹ *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").

² *See, e.g.*, Comments of Interlogix, Inc. at 2; Comments of Johnson Controls, Inc. at 2; Comments of the Consumer Electronics Association at 2; Comments of Cisco Systems, Inc. at 5; Comments of the Information Technology Industry Council.

function of the type of information being sent.”³ This change is clearly warranted and the Commission should revise its rules accordingly.⁴

Several parties advanced additional proposals to relax the Section 15.231 technical rules in other ways. While ADEMCO supports some of these proposals, the Commission should proceed very cautiously in this area, because the technical restrictions under Sections 15.231 and 15.35 are necessary to keep interference at acceptable levels. ADEMCO’s comments on specific proposals follow.

Increase in transmission time per hour (Section 15.231(a)(3)). ADEMCO supports Interlogix’s proposals to (i) increase the permitted transmission time from one to two seconds per hour, and (ii) permit devices to meet this requirement by transmitting in a number of shorter intervals, so long as the total transmission time in any one-hour interval does not exceed two seconds.⁵ The extra second of transmission time may enhance the utility of devices operating pursuant to Section 15.231 while not contributing significantly to their interference potential. The use of a number of shorter intervals to meet this total transmission time should reduce interference potential and allow more devices to share a given frequency band.

Five-second rule (Section 15.231(a)(1)-(2)). ADEMCO urges the Commission not to alter the so-called five-second rule – the requirement that any transmission be automatically deactivated within five seconds – as Interlogix and Johnson Controls request.⁶ The five-second

³ Comments of Cisco Systems, Inc. at 5.

⁴ The ability of remote control devices to transmit data should logically be interpreted to include the transmission of digitally encoded voice information, appropriately limited in duration. See Comments of Linear Corporation at 4. However, to the extent Lifeline Systems is proposing to transmit continuous analog voice data pursuant to Section 15.231(a), any such continuous transmission would violate the timing restrictions contained in the rules and create interference concerns. See Comments of Lifeline Systems, Inc. at 3.

⁵ Comments of Interlogix, Inc. at 2-3.

⁶ See Comments of Interlogix, Inc. at 3; Comments of Johnson Controls, Inc. at 5.

rule may initially have been an arbitrary choice, as Johnson Controls suggests, but it has proved in practice to be a workable limitation that manufacturers abide by with little or no difficulty. The rule is effective in ensuring a quiet band, and thus promotes interference-free operation of Part 15 devices.

Duty cycle averaging period (Section 15.35(c)). The Commission should not change the applicable duty cycle averaging period from 100 milliseconds to 1 second as requested by the Consumer Electronics Association.⁷ Allowing longer transmission times would be contrary to the short-burst principle underlying the shared use of spectrum by devices operating pursuant to these rules. The Consumer Electronics Association states that the shorter averaging period fails to provide enough time to establish a communications link. However, ADEMCO's devices set up a communications link and transmit preamble and error checking information, all within the space of 10 milliseconds. Other manufacturers achieve similar results.

Power limit exception for trained operators. The Commission should not permit higher power transmissions for devices operated under the control of trained operators as Enalasis requests.⁸ Part 15 is designed to permit the operation of low-power devices. Any type of high-power operation is incompatible with existing Part 15 uses.⁹ Enalasis has not described any specific characteristics of its equipment that would make operation by trained professionals less prone to cause interference than operation by consumers. Absent any such distinguishing characteristics, there are no grounds for an exception to the rules. If Enalasis has special needs

⁷ See Comments of the Consumer Electronics Association at 2.

⁸ See Comments of Enalasis Corporation at 3-4.

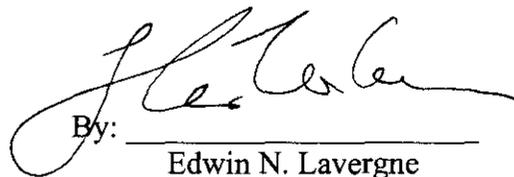
⁹ See Exemption of Certain Radio Devices To be Used By Law Enforcement Agencies From the Commission's Equipment Authorization and Licensing Requirements, *Order*, 6 FCC Rcd 3392, 3394 n.14 (1991) (unlicensed operation of higher-powered equipment could interfere with Part 15 communications).

with respect to its equipment it may be appropriate for the Commission to consider these needs in the context of a waiver request.

Radio-controlled toys (Section 15.231(a)). Finally, Section 15.231(a) currently prohibits “radio control of toys.” Mattel points out that the proposed revision to Section 15.231(a) appears to have eliminated that prohibition.¹⁰ However, the Commission did not discuss this issue, and it should not eliminate the prohibition on radio control of toys. Devices authorized pursuant to Section 15.231 are deployed in security, safety, and other vital applications which could be disrupted by the intensive and repetitive uses that can be predicted to occur with radio-controlled toys. If Mattel believes that existing bands are inadequate for new radio-controlled applications, it should request a specific rule making proceeding for the purpose of identifying new spectrum. In such a proceeding, the costs and benefits of operation in various bands can be properly examined.

Respectfully submitted,

THE ADEMCO GROUP


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¹⁰ See Comments of Mattel, Inc. at 1; *NPRMO* at Appendix A, ¶ 18.