



Space Data's subsidiaries hold a nationwide license and are high bidder, with pending applications, on licenses in the 901-902, 930-931 and 940-941 MHz bands<sup>1</sup> and is interested in enhanced service offerings through interoperability with devices operating on terrestrial systems in the adjacent 902-928 MHz band. Lately there has been much interest in location and monitoring type applications on Space Data's frequencies. The combination of Space Data's ubiquitous coverage to unserved areas in the 901-902, 930-931 and 940-941 bands with devices that can interoperate on the LMS service to provide location and monitoring features, would allow service offerings of great benefit to many businesses and consumers, particularly in rural areas. Space Data is, therefore, keenly interested in the uses of and technical rules for the 902-928 MHz band. Space Data supports greater flexibility in this band for LMS systems while maintaining sufficient interference protections for the continued sharing of the band and for out-of-band interference protections of the 901-902 portion of the Narrowband Personal Communications Services (NPCS) band where low power user devices operate. Space Data believes that the public will benefit from the enhanced service offerings that greater flexibility will allow and that any technical issues related to spectrum sharing in the band can be resolved in a Rulemaking proceeding.

Space Data believes that the time is right for this Rulemaking proceeding because, since the original rules were crafted, the technological advances make possible a scenario whereby the 902 to 928 MHz band could be put to much more robust use, particularly in bringing flexible service offerings to rural America. Further, technically feasible forms

sharing in this band could put its prime spectrum to use in serving more customer requirements in the wireless communications marketplace.

## **CONCLUSION**

Therefore, for the reasons stated above, Space Data urges the Commission to proceed expeditiously with a Rulemaking proceeding to bring greater flexibility to the Location and Monitoring Service.

Respectfully submitted,

Space Data Corporation

By: Gerald M. Knoblach, Chairman and CEO

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<sup>1</sup> Narrowband PCS license, callsign KNKV204 and Experimental license, call sign WC2XVM.