



**King County
Information and
Telecommunications
Services Division**

Department of Executive Services

700 Fifth Avenue, Suite 2300
Seattle, WA 98104-5002

206-296-0600
206-263-4834 Fax
711 TTY Relay

October 18, 2002

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: WT Docket No. 02-55
Ex Parte Presentation
Reference: Ex Parte presentation by Southern Communications Services, Inc.
Friday, October 11, 2002

Dear Ms. Dortch:

It has been brought to our attention that work conducted for King County, Washington by our consulting engineers ADCOMM Engineering has been referenced in the above referenced Ex Parte presentation. The purpose of this letter, and the attached letter from ADCOMM Engineering, is to make sure there is a clear understanding of the work we did and how to interpret that work.

We commissioned ADCOMM Engineering to conduct receiver performance testing on Motorola MTS2000 model portable radios since those radios were having performance problems working in close proximity to commercial radio sites and Motorola had issued a recommended modification to the radios to improve the performance. The MTS2000 is not the only radio in our inventory that experiences these problems, but it was by far the most problematic since we deploy that radio in depth in our user community.

As explained in the report itself and in ADCOMM's letter attached, the testing we performed concluded that the recommended modifications did improve the performance of the MTS2000 radio. It is important to note however that all the modification did was make the MTS2000 radio perform comparably to other radio models we utilize in our system. It did not make it any better than these other models, nor did it improve performance of the MTS2000 radio in RF environments which exhibit high levels of energy as is typical in a cellular system.

Quite frankly, what this testing demonstrates to us is that all radios have receiver intermodulation problems when operating in close proximity to Nextel or other commercial cellular sites. It is our belief that the current lack of stringent receiver standards coupled with

the inadequacies of the EIA/TIA 603A testing procedure put 800 MHz trunked radio system users in a position where we just can't predict nor rely on our radios working in close proximity to these commercial sites.

We certainly did not conclude that this modification to the MTS2000 radios is a solution to the interference problems in the 800 MHz band. It is just a way to make one particular radio model from one particular vendor work as well as it can given the current standards and testing processes.

Please feel free to direct any further questions you have on this matter to either myself or Mr. Joe Blaschka with ADCOMM Engineering.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Kearns". The signature is fluid and cursive, with the first letter of each word being capitalized and prominent.

Kevin Kearns
Division Manager