



Industrial Telecommunications Association, Inc.
Total Frequency Management

December 12, 2002

Mr. Edmond J. Thomas
Chief, Office of Engineering and Technology
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Review of Part 15 and Other Parts of the Commission's Rules, ET Docket 01-278

Dear Mr. Thomas:

On October 15, 2002, the National Telecommunications and Information Administration (NTIA) filed a letter, along with a technical analysis of radio frequency identification systems (RFID) tags in the 425-435 MHz band, with the Office of Engineering and Technology.¹ The letter responded to a Commission proposal that would amend Part 15 of its rules to allow improved RFID devices with increased power levels and increased duty factor into the 425-435 MHz band.²

In the letter, NTIA suggested moving RFID tag operations to the 450-470 MHz band rather than the proposed 425-435 MHz band.³ ITA understands the importance of interference free military operations, especially in today's climate of the increased threat of terrorism coupled with the possibility of war. However, the current users of the 450-470 MHz band, a mix of public safety and private wireless licensees, also have important communication needs that must remain interference free. Public safety users, as well as private wireless users, provide safety-of-life communications for the general public and their employees on a daily, sometimes 24-hours a day, basis. RFID tag systems should also be afforded interference free operations to the greatest extent possible.

¹ See, Letter from Frederick R. Wentland, NTIA, to Mr. Edmond J. Thomas, Chief, Office of Engineering and Technology, FCC, filed on Oct. 15, 2002. Review of Part 15 and Other Parts of the Commissions Rules, ET Docket 01-278 (Letter).

² See, Review of Part 15 and Other Parts of the Commission's Rules, *Notice of Proposed Rulemaking and Order*, ET Docket No. 01-278 (rel. Oct. 15, 2001) ¶ 23, (NPRM).

³ Letter at page 4.

The public safety and private wireless operations existing in the 450-470 MHz band are already coping with an overcrowded environment. "License assignments in this band (450-470 MHz) are on a...time-shared basis, and extreme congestion in the band has resulted in a contiguously degraded level of communications quality, due to both co-channel and adjacent channel interference as well as the increased interference noise floors."⁴ The addition of a new service to an already overcrowded band may have negative consequences for future RFID tag operations, as well as for incumbent systems in the 450-470 MHz band.

ITA understands the need for interference free military operations, but RFID tag operations should not be put on the air in the 450-470 MHz band at the expense of other licensees that provide safety-of-life communications. ITA suggests that, at a minimum, NTIA conduct a study on the affect that RFID tag operations would have on licensees in the 450-470 MHz band or other potential locations for RFID tags before recommending that their operation would be best suited for that spectral environment. Only after the record demonstrates that current operations in the band will not be degraded, should the Commission consider RFID tag operations in the 450-470 MHz band.

ITA looks forward to working with NTIA and the Commission to find an appropriate location for RFID tags on the electromagnetic spectrum.

Sincerely,

Jeremy W. Denton
Director, Government Affairs

CC: Frederick R. Wentland
NTIA

⁴ See, An Allocation of Spectrum for the Private Mobile Radio Services, *Petition for Rulemaking*, submitted by the Land Mobile Communications Council on April 22, 1998, at page 13.