

A change in the maximum permissible EIRP in this band is not in the interests of the public use. Even with the current regulation, the noise floor is rising rapidly, limiting usefulness. The existing regulations should be maintained without a waiver.

Additional noise in a sensitive environment (healthcare, OR's in particular) is also not in the interest of public health.

The petitioner does not offer to confirm proper operation of the myriad of devices that could be located in the environment.

The introduction of improper responses in ancillary equipment could be fatal the patient. There is no current test for levels of RF at this frequency for susceptibility in devices such as anaesthesia, pacing, ventilation, etc. The risk is simply too great to justify the petition.

Alternatives exist for the petitioner to seek a specific, coordinated frequency for this use. There are also ISM options as well. There is no need for this specific spectrum, other than the convenience of the petitioner.

This petition is ill advised and should be denied.

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