



GE Healthcare Monitoring Solutions

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January 9, 2008

BY ELECTRONIC FILING

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

**Re: *Ex Parte* Letter from GE Healthcare
ET Docket Nos. 04-186 and 02-380**

Dear Ms. Dortch:

GE Healthcare ("GEHC") submits this *ex parte* filing to express its general support for the licensed, fixed-use proposal relating to the TV bands white spaces set forth in a recent white paper from FiberTower Corporation and the Rural Telecommunications Group, Inc.¹ With only a few minor improvements, the approach recommended in the *White Paper* could be an effective model for efficient spectrum use while at the same time protecting incumbents, including medical telemetry, from harmful interference. It would also encourage accountability and provide regulatory certainty to stakeholders in the TV bands.

As GEHC has previously stated, the use of unlicensed, personal/portable devices in the TV bands poses a significant risk of harmful interference to safety-of-life Wireless Medical Telemetry Service ("WMTS") and Part 15 medical telemetry operations.² For example, personal/portable devices operating in close proximity to medical telemetry systems could cause the medical telemetry receivers to overload from strong adjacent channel signals.³ Fixed stations, on the other hand, can be deployed in locations that will minimize interference to medical telemetry users.⁴

¹ "Optimizing the TV Bands White Spaces: A Licensed, Fixed-Use Model for Interference-Free Television and Increased Broadband Deployment in Rural and Urban Areas," *Ex Parte* filing by FiberTower Corporation and Rural Telecommunications Group, Inc., ET Docket Nos. 04-186, 02-380 (filed Oct. 2, 2007) ("*White Paper*").

² *Ex Parte* filing by GE Healthcare, ET Docket Nos. 04-186, 02-380, at 4-5 (filed. Aug. 27, 2007) ("*GEHC August 2007 Ex Parte*"); *Ex Parte* notice of GE Healthcare, ET Docket Nos. 04-186, 02-380, Attachment at 8, 12, 13, 15 (filed. Sept. 17, 2007) ("*GEHC September 2007 Ex Parte*").

³ *GEHC September 2007 Ex Parte* at 13.

⁴ *See White Paper* at 5-6.

GEHC supports the licensed regime proposed in the *White Paper*. A licensed approach to the TV bands white spaces would ensure accountability among the new users of the TV bands.⁵ It would also facilitate the enforcement of the Commission's technical rules and make it easier to resolve interference problems that may arise.

In addition to adopting the proposed technical requirements described in the *White Paper*, the Commission should adopt specific limits for spurious emissions in TV channel 37, where licensed WMTS operations occur. As GEHC has noted, spurious emissions from new white spaces users – including from fixed, licensed services – threaten adjacent channel operations.⁶ Although the *White Paper* proposed emissions limits for new fixed operations based on the transmitter radiated emissions limits set forth in Section 74.637(a)(2) of the Commission's rules, due to the relatively high proposed EIRP these limits alone are insufficient to protect against harmful interference from spurious emissions in TV channel 37. Therefore, an additional absolute limit on the field strength of spurious emissions at the perimeter of WMTS installations would be required.

As GEHC has previously stated, many hospitals across the country operate Part 15 wireless medical telemetry systems in addition to licensed WMTS systems. In order to avoid interference to Part 15 medical telemetry systems, the Commission, in addition to the other requirements proposed in the *White Paper*, should require new fixed service users operating on TV channels 7-46 to notify nearby hospitals in advance of commencing operations, similar to the existing requirement applicable to digital television stations.⁷ It should also adopt a maximum field strength limit on new white spaces operations near medical telemetry installations.

Respectfully Submitted,

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⁵ See *GEHC August 2007 Ex Parte* at 6. As discussed in the *White Paper*, a licensed approach would also avoid the tragedy of the commons. *White Paper* at 16-18.

⁶ *GEHC August 2007 Ex Parte* at 8-9; see also *GEHC September 2007 Ex Parte* at 8, 12. Spurious emissions from personal/portable devices pose an even greater interference threat to critical WMTS and Part 15 medical telemetry users.

⁷ See Comments of GE Healthcare, ET Docket Nos. 04-186, 02-380, at 6 (filed Jan. 31, 2007). GEHC also encourages the use of a "coordination point," as suggested in the *White Paper*. See *White Paper* at 19.