

**In the matter of**

**WT Docket 07-195**

**Service rules for Advanced Wireless Services in the 2155-2175 MHz Band**

**and**

**WT Docket 04-356**

**Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands**

**Response Comments regarding the Further Notice of  
Proposed Rulemaking And Potential Impact the UPCS Band**

<b>Date:</b> 06-Aug-2008	<b>Project name</b>	<b>Technical Documentation</b>	
<b>File:</b> FCC.doc		<b>Ref.:</b> JCM	<b>Page:</b> 1 of 2

## 1 Concerns

The proposed out-of-band emission limits are considered to cause harmful interference in the adjacent UCPS band. The proposed out-of-band emission combined with the required spectrum etiquette in the UPCS band may inhibit a UPCS device to allocate spectrum in case of a co-located H Block device operating in the 1915 – 1920 MHz band.

## 2 Preventive measures

RTX Telecom support the proposal submitted by DECT Forum. The proposed elimination of the least-interfered-channel rule and modification of minimum monitored channels, allows an UPCS device to co-exist with the modified H Block out-of-band emission requirements at minimum loss of system performance.

## 3 RTX background

RTX Telecom A/S is an internally oriented group with its main activities in development and production of advanced wireless communication IP and solutions. RTX Telecom A/S has completed more than 500 DECT projects and has 15 years experience in development of DECT hardware and software technology. RTX Telecom A/S was among the very first companies to develop and obtain FCC approval of DECT technology in the UPCS band.

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