

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band)	WT Docket No. 07-195
)	
Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands)	WT Docket No. 04-356
)	
DECT Forum Petition to Modify the Service Rules for the UPCS Band 1920- 1930 MHz)	RM 11485
)	

To: The Commission

**COMMENTS OF
PANASONIC CORPORATION OF NORTH AMERICA**

I. SUMMARY:

Panasonic Corporation of North America (“Panasonic”) submits these comments to the Federal Communications Commission (“Commission”) in support of the Petition for Rulemaking filed by the Digital Enhanced Cordless Telecommunications (DECT) Forum to revise FCC Part 15 D, Unlicensed Personal Communications Services (UPCS). Panasonic supports the DECT Forum petition because the changes sought would both improve the utilization of the UPCS band (1920-1930) and mitigate potential interference from new devices operating under service rules proposed for the 1915-1920 MHz AWS H-Block (“H-Block”) in the above captioned proceeding.¹

¹ See: *In the Matter of Petition for Rulemaking to coordinate the service rules of the UPCS Band with those ultimately adopted for the AWS H Block*, RM-11485, WT Dockets No. 07-195, 04-356 (filed August 11, 2008) (DECT Forum Petition).

II. BACKGROUND:

Panasonic is the principal North American subsidiary of Panasonic Corporation (NYSE: PC), and the hub of its marketing, sales, service and R&D operations for “Panasonic” brand products. (Matsushita Electric Industrial Co., Ltd. announced that it has become Panasonic Corporation and its stock symbol on the New York Stock Exchange has been changed to PC from MC on October 1, 2008.) Panasonic is a major manufacturer and marketer of cordless phone systems in the United States. These products include home and business telephone systems utilizing DECT 6.0 compatible cordless technologies which could be adversely affected by harmful interference to such cordless devices operating in the UPCS band that would result from the Commission’s proposed H-Block rules.

III. DISCUSSION:

A. UPCS Rules Must Be Changed to Avoid Harmful Interference from H-Band Devices

Panasonic supports the modifications to the UPCS rules put forward by the DECT Forum to: (1) Eliminate the threshold requirement associated with the least interfered-channel rule in 47CFR15.323(c)(5); and (2) Reduce the minimum number of channels to be monitored from 40 to 20. Panasonic agrees with the DECT Forum that the proposed changes to the UPCS band rules would have no negative impact on adjacent PCS services, but they are needed to avoid harmful interference to UPCS band devices by H-block transmissions. The changes proposed by the DECT Forum would permit DECT cordless phones to operate in the more ‘noisy’ environment that will be created when H-Block devices are collocated within 4 meters of a UPSC [DECT] device.

B. Expeditious Action by the Commission is Needed to Protect Consumers

Panasonic urges expeditious action by the Commission on the DECT Forum Petition in order to minimize the potential impact on existing consumers with UPCS-band customer premises equipment (“CPE”). In the North American market, DECT technologies have already achieved considerable market acceptance by consumers due to their interference-free operation and voice clarity. On July 17, 2008, the DECT Forum announced that DECT 6.0 cordless devices have reached a 53 % dollar share in the United States in May 2008, according to data from the NPD Group’s retail tracking service.² This is a marked increase from the 17.9 % dollar share in the United States reported in the September 2007 data from the NPD Group/Retail Tracking Service.³ In Panasonic’s own 2008 product line, fully 39 out of 44 models utilize DECT 6.0 technologies. Since these first-generation DECT 6.0 products operate under the existing UPCS rules, they are not protected from harmful interference that would arise with the introduction of new H-Block devices operating under the FCC’s proposed rules. This rapid change in the market to DECT 6.0 devices, which has preceded the FCC’s proposed rules for the new H-Block, requires the Commission to act as quickly as possible in order to minimize the size of the installed base of consumer CPE that would be exposed to potential harmful interference from new H-Block operations. For this reason, we believe

² See: July 17, 2008 DECT Forum Press Release, “*DECT 6.0 Reaches 53 % of the Total Cordless US Market*” at:

http://www.dect.org/UserFiles/file/Press%20releases/PR_07172008_DECT%206.0%20Reaches%2053%20%25%20of%20the%20Total%20Cordless%20US%20Market.pdf (last visited Oct 1, 2008).

³ See: October 29, 2007, DECT Forum Press Release, “*DECT 6.0 Market Share Surpasses 17 %*” at:

http://www.dect.org/UserFiles/file/Press%20releases/PR_10292007_DECT%206.0%20Market%20Share%20Surpasses%2017%20%25.pdf (last visited Oct 1, 2008).

it would be in the public interest for the Commission to act favorably and rapidly on the DECT Petition, and we urge the Commission to do so.

C. It is in the Public Interest to Encourage Broadband-Connected Products

Panasonic also believes that the DECT Petition is in the public interest because it will provide equipment designers with further opportunities to develop innovative devices for future broadband applications using the UPCS band itself. On December 5, 2006, the DECT Forum announced the development of “CAT-iq” technology for **broadband home connectivity** using DECT technology. CAT-iq stands for “Cordless Advanced Technology – internet and quality”, and this technology will support new consumer product categories in the home. CAT-iq will bring broadband Internet and telephony together into convenient, easy-to-use products, and it is expected to provide new application categories and devices over the next years, such as wireless music streaming and improved audio quality for IP-enabled conferencing systems. As the Commission has long promoted the value of expanding broadband availability and utility in its telecommunications policy, we urge the Commission here to thus support the increased utilization of the UPCS band for the broadband applications that the DECT Forum seeks to enable in its Petition.

