



In the Matter of)
)
 GE Healthcare Petition for Rulemaking) ET Docket No. 08-59
 For New Medical Body Area Network)
 Service at 2360-2400 MHz)

To: The Commission

EX PARTE COMMENTS OF BAXTER HEALTHCARE

Baxter Healthcare Corporation (“Baxter”) hereby submits these comments in support of the proposed allocation of the 2360-2400 MHz band for the Medical Body Area Network Service (“MBANS”), including the operation of wireless medical Body Sensor Networks (“BSNs”).¹ Baxter urges the Commission to move expeditiously toward a Notice of Proposed Rulemaking (“NPRM”) to foster the development of short-range wireless medical device applications for hospitals and home patient care.

Baxter is a global diversified healthcare company that develops critical products and therapies that save and sustain lives, including intravenous fluids and medication, dialysis, biopharmaceuticals, vaccines, and anesthetics. Baxter is an \$11.3 billion market leader with more than 75 years of experience driven by a well-recognized global brand. Baxter has an international presence with more than 46,000 employees in 60 countries, more than 120 manufacturing facilities in 26 countries, and products sold in more than 100 countries.

Baxter believes the proposed MBANS allocation would enable low-cost, low-power, high-throughput, low-duty cycle, high-quality, and short-range wireless medical device applications that are currently not achievable using existing medical bands such as WMTS or MedRadio. Baxter agrees that the proposed MBANS allocation would not only address the many challenges and demands in healthcare but would also greatly improve the quality and efficiency of healthcare delivery. Baxter believes MBANS devices can coexist with incumbent services by using technologies and open standards available today to mitigate interference risk.

The pending MBANS proposal provides the Commission with a tremendous opportunity to facilitate the improvement of healthcare delivery. Baxter urges the Commission to move forward expeditiously with an NPRM proposing the creation of the MBANS service.

Respectfully submitted,

Baxter Healthcare Corporation

November 4, 2008

¹ See Ex Parte of GE Healthcare in ET Docket No. 06-135 (Dec. 27, 2007).