Before the
Federal Communications Commission
Washington DC 20554

In the Matter of	)	
	)	
Request by the TETRA Association	)	
for Waiver of Sections 90.209,	)	ET Docket No. 09-234
90.210 and 2.1043 of the Commission's	)	
Rules	)	

COMMENTS OF ACLARA RF SYSTEMS INC.

Aclara RF Systems Inc. conditionally opposes the above-captioned waiver request of the TETRA Association,[1] for the reasons stated below.

Aclara uses the 450-470 MHz band for automatic meter reading with low-power transmitters under Section 90.267. Aclara has over ten million transmitters installed. Its only interest in this proceeding is in limiting the risk of harmful interference to its operations.

TETRA seeks changes to the emissions masks. Aclara's concern is that some applications of the proposed masks across the 450-470 MHz band, along with the use of high power transmitters on these channels, would cause excessive additional adjacent channel interference.

Under the waiver, a TETRA transmitter would aggregate two adjacent 12.5 kHz channels and operate on a center frequency halfway between them.[2] The signal thus occupies 25 kHz of bandwidth, but the center frequency is displaced 6.25 kHz from the conventional 25 kHz

---

1 *Office of Engineering and Technology Declares the TETRA Association's Request for a Waiver of Parts 90.209, 90.210 and 2.1043 to Be a "Permit-But-Disclose" Proceeding for Ex Parte Purposes and Requests Comment*, ET Docket No. 09-234, DA 09-2633 (released Dec. 24, 2009).

2 TETRA Request at Appendix A. TETRA can also form a 25 kHz channel by aggregating four adjacent 6.25 kHz channels. *Id.*

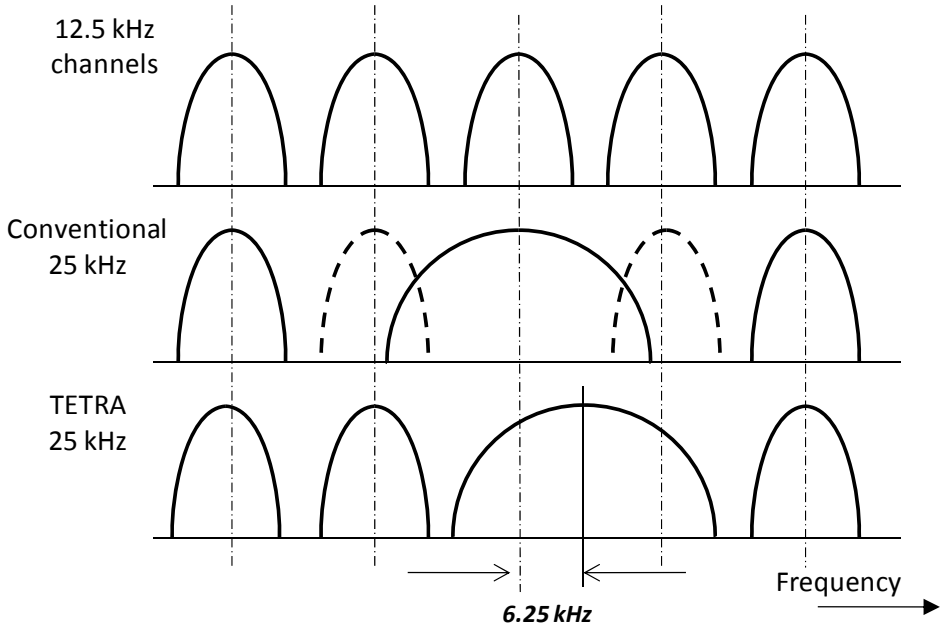

Figure 1
Comparison of 12.5 and 25 kHz channels

channeling plan.[3] The result, in effect, is a 25 kHz channel centered on a 6.25 kHz channel. See Figure 1.

Aclara has no objection to this arrangement. As Figure 1 shows, it affords better protection to adjacent 12.5 kHz channels than does the conventional plan.

Our concern is that TETRA users unable to coordinate adjacent 12.5 kHz channels at some locations may instead seek to coordinate a conventional 25 kHz channel. Given TETRA's relatively high power and over-wide channel occupancy, that would threaten two adjacent 12.5 kHz channels, shown as dashed lines in Figure 1.

Aclara operates on frequencies that were formerly 12.5 kHz low-power "offset" channels between 25 kHz main channels. In the refarming that reduced the default bandwidth to 12.5 kHz,

[3] Conventional 25 kHz channels are centered on every second 12.5 kHz channel, as shown in Figure 1.

those offset channels became main channels in their own right, although some are set aside for low-power operation under Section 90.267. It is just these former offset channels (dashed lines in Figure 1) that would suffer incursion from TETRA operations on conventional 25 kHz centers.

Aclara therefore opposes the waiver request unless the Commission requires, as a condition, that TETRA form its 25 kHz channels by aggregating adjacent pairs of 12.5 kHz channels, and that TETRA be prohibited from operating on conventional 25 kHz channel centers.

Respectfully submitted,

Mitchell Lazarus
FLETCHER, HEALD & HILDRETH, P.L.C.
1300 North 17th Street, 11th Floor
Arlington, VA 22209
703-812-0440
Counsel for Aclara RF Systems Inc.

January 15, 2010