

In the Matter of)
)
Amendment of Part 15 of the Commission's Rules) ET Docket No. 10-97
Regarding Unlicensed Personal Communications) RM-11485
Service Devices in the 1920-1930 MHz band)
)

Comments Supporting **The Proposed Rule Changes in ET Docket 10-97**

The DECT Forum hereby files these comments in support of the Notice of Proposed Rulemaking to revise certain rules in FCC Part 15 Subpart D, UPCS Band.

I. Background

In 2008 the DECT Forum became concerned about a potential for interference to devices in the UPCS band, created by the proposed service rules for the 1915-1920 MHz band as set forth in the Further Notice of Proposed Rulemaking (FNPRM) WT Docket No. 04-356. The two bands, the UPCS and AWS, are governed by very different methods of spectrum management. The UPCS band is an unlicensed band using a spectrum etiquette to implement a dynamic spectrum access method of spectrum management. The AWS band is a licensed band implementing rules appropriate to that method of spectrum management. The problem was an unintended consequence created by the interaction of these two very different methods of spectrum management. The DECT Forum believed that there would be harmful interference to the UPCS band if those proposed service rules were adopted without corresponding changes in the rules for the UPCS band. In August of

2008 the DECT Forum filed a petition for rulemaking, requesting the following changes to the UPCS least-interference-channel rules in Part 15:

1. That the upper threshold be raised or eliminated.
2. That the number of channels to be monitored be reduced from 40 to 20.

The DECT Forum petition also identified an issue with the required number of channels under the least-interfered-channel rule. The rule required that a device operating under the least-interfered-channel provision monitor a minimum of 40 channels and use the channel with the least interference. At the time the rule was originally written the UPCS band was 20 MHz wide. Subsequently the UPCS band was reduced to 10 MHz,¹ but no reduction was made in the number of channels to be monitored. As technology develops and wider band devices are introduced to the UPCS band it is becoming increasingly difficult to identify 40 separate channels. In its petition the DECT Forum therefore recommended that the channel count be reduced to 20 channels, a reduction proportional to the reduction in the UPCS band.²

On September 4, 2009 the Commission issued a request for comments on the DECT Forum petition, RM-11485.^{3,4} Twelve parties filed comments in response to this request for comments.⁵ All commenters supported the proposal to either eliminate or at least

¹ The UPCS band was reduced to its current bandwidth of 1920-1930 MHz.

² It is worth noting that originally the maximum channel bandwidth for the UPCS band was 1.25 MHz. This was changed in 2004 to 2.5 MHz but the number of channels to be monitored remained unchanged. This increase in maximum channel bandwidth provides another reason for reducing the number of monitored channels under the least-interfered-channel rule.

³ "Petition for Rulemaking to coordinate the service rules of the UPCS Band with those ultimately adopted for the AWS H Block," Petition for Rulemaking, filed Aug. 15, 2008, by DECT Forum, placed on Public Notice for comment on September 4, 2008 (Report No. 2873; RM-11485)

⁴ FCC Public Notice, DOC-285137A1, September 4, 2009

⁵ Aastra DeTeWe GmbH (Aastra-DeTeWe); Ascom Wireless Solutions (Ascom); Baycom Opto-Elec. Co., Ltd.(Baycom); Bithium – Sistemas de Telecomunicacoes (Bithium); DSP Group, Inc. (DSPG); Panasonic Corporation of North America (Panasonic); Philips Consumer Lifestyle (Philips); Plantronics, Inc. (Plantronics); SiTel Semiconductor B.V. (SiTel); Telecommunications Industry Association (TIA); UTAM, Inc. (UTAM); VTech Communications (VTech).

increase the least-interfered channel threshold. All commenters also supported the proposal to reduce the number of channels a UPCS device must define and monitor in order to use the least-interfered channel access method.

In December 2009 the DECT Forum filed a set of informational comments, on the types of devices using the UPCS band, trends in equipment grants and the probable direction of technology in this band.

The DECT Forum appreciates the Commission's support of its petition, represented in the issuing of ET Docket 10-97. We believe the proposed changes will be beneficial for the continued development of the UPCS band and will assure that the band will coexist harmoniously beside future AWS devices using the 1915-1920 MHz block.

II. About the DECT Forum

The DECT Forum is an international industry association embracing suppliers and operators of DECT based terminals, systems, and networks. DECT stands for "Digital Enhanced Cordless Telecommunications" and denotes a radio technology suited for voice data and networking applications with range requirements up to a few hundred meters. The DECT Forum represents the interests of the DECT industry with the following primary objectives:

- To promote DECT as the worldwide cordless communication standard.
- To pursue worldwide harmonization of frequencies for DECT products.
- To provide an interactive forum for sharing information and experience between regulatory and standardization agencies, operators, users and manufacturers.
- To manage the evolution of DECT so as to protect legacy investments and permit orderly service migration and expansion.

III. Proposed Changes in ET Docket 10-97

The DECT Forum believes the rule changes proposed in ET Docket are well reasoned and urgently needed. We therefore strongly support the Commission's proposed action in this docket.

IV. Summary

In these comments the DECT Forum has set forth its reasons for strongly supporting the rule changes proposed in ET Docket 10-97.

The proposed changes have no negative impact that we are aware of and are needed to avoid the blocking of a major part of the UPCS band by H-block transmissions. Therefore, DECT Forum urges the Commission to adopt the proposed changes without delay.

The DECT Forum thanks the Commission for the opportunity to provide these comments.

Respectfully submitted,

DECT Forum

May 26, 2010
for the DECT Forum
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