

**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** )  
 )

To: The Commission

Comments Supporting  
the  
Notice of Proposed Rulemaking  
Modifying Certain Rules in FCC Part 15  
Governing the UPCS Band

Plantronics, Inc. (“Plantronics”) submits the following comments in the above-referenced proceedings.

Plantronics, with world headquarters in Santa Cruz, California, designs headsets for a variety of applications and using a variety of technologies. Plantronics products include wireless headset/telephone-adaptor products, combination telephone/computer-interface wireless headset systems, and dongle-based wireless headset adaptors, all making use of the 1920 – 1930 MHz UPCS band. Plantronics products using the UPCS band are found in the home, in small offices, and in large businesses in high-unit-count deployments, offering the user professional-grade audio quality untethered from the telephone handset cord, and/or from wired connection to the computer.

**I. Statement of support for the Rulemaking in toto**

Plantronics is aware of the potential for interference created by proximate transmitters using frequencies adjacent to the 1920 – 1930 MHz UPCS band. Plantronics has also experienced limitations to performance imposed on production equipment using the newest technologies for wideband audio created by the extant mandate to use the lower interference threshold for systems

that, as enabled to deliver better-than-toll-bandwidth audio quality to the end user, no longer meet the conditions for using the upper threshold allowed under 15.323(c)(5) in that for wideband mode 40 duplex channels are not available. Such limitations experienced in high-volume deployments include the inability or limited ability to operate in a high-user-count installation in wideband audio mode.

Plantronics' experiences with deployed equipment supports the proposed modifications in that these changes will improve the utility of the band for end-users.

Plantronics supports the changes to the text of 15.31, 15.38 and 15.323 as proposed, in that these changes appear to accurately reflect the proposed technical changes and update the references to the test standards of intent.

Plantronics believes that this is a matter of urgency, as equipment presently being produced and fielded is subjected to the referenced limitations

## **II. A Discussion of the Technical Basis for Support of the Rulemaking**

The proposed change to 15.323 allowing devices that provide 20 duplex channels instead of the previous 40 duplex channels will allow systems providing wider-than-telephony-audio-bandwidth to use the upper threshold. This in turn will in enable the use of such devices in density installations. Experience with deployments suggests that such usage will be a net benefit to the end users; the use of the upper threshold instead of the lower threshold will not impact the utility of such products in such an environment; other-user interference for other systems using the upper threshold will be present, but the choice is between not using the system or having range limited by other users, the latter being preferred.

Experience with path-loss and propagation characteristics in extant deployments indicates that increasing the upper threshold from 50dB above thermal to 65dB above thermal is expected to not impact operation where interference is dominated by users within the band. Increasing the

upper threshold to 65dB above thermal will offer increased end-user usability where other-user interference from proximate transmitters operating outside the UPCS band are present.

### **III. Summary**

Plantronics is confident that the proposed rules changes will improve the end-user experience with equipment designed for the band.

Respectfully submitted,

**Plantronics, Inc.**

By: /s/ Steve Cahill

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