

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

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

**COMMENTS OF
PANASONIC CORPORATION OF NORTH AMERICA**

Panasonic Corporation of North America (hereinafter “Panasonic”) is pleased to submit these Comments in support of the proposed changes to Part 15 of the Rules to enable Unlicensed Personal Communications Service (UPCS) devices operating in the 1920-1930 MHz band (known as the UPCS band) to make more efficient use of this spectrum.¹

CORPORATE OVERVIEW:

Panasonic Corporation of North America is the principal North American subsidiary of Panasonic Corporation (Panasonic [NYSE: PC]), a world leader in consumer electronics, telecommunications and energy-related products. Based in Secaucus, NJ, Panasonic Corporation of North America markets in the United States a broad line of digital and other electronics products for consumer, business and industrial use. On September 17, 2009, Panasonic celebrated its 50th anniversary in the US. Today, Panasonic has more than 5000 employees in the US, and also employs approximately 6500 in Canada and Mexico. Panasonic is the market leader today in performance-leading plasma televisions, including Full HD 3D

¹ Notice of Proposed Rulemaking (“NPRM”), Amendment of Part 15 of the Commission’s Rules Regarding Unlicensed Personal Communications Service Devices in the 1920-1930 MHz band, ET Docket No. 10-97 (rel. May 6, 2010).

televisions and displays. Panasonic also designs and manufactures home theater systems, AV receivers and amplifiers, DVD recorders and players, high-definition Blu-ray disc players and Blu-ray disc drives, laptop computers, network routers, and wireless and wired home networking equipment.

Panasonic is the leading manufacturer of cordless home telephones worldwide, and all of its 2010 cordless home telephone systems, available at retailers nationwide, utilize DECT 6.0 protocols with additional proprietary features for optimal sound quality and extended range.² Panasonic is also a leader in business telephone systems, and continues to lead the North American small business telephone market by achieving #1 market share for the calendar year 2009 in North America.³ Panasonic is a member of the DECT Forum, an international association of suppliers and operators of devices, systems and networks using the "Digital Enhanced Cordless Telecommunications" radio technology, which facilitates voice, data and networking applications with range requirements up to a few hundred meters.

SUMMARY:

Panasonic submits these comments in support of the Commission's proposal to modify Section 15.323 to specify a least-interfered channel monitoring threshold of 65 dB above thermal noise and to increase the utilization of the UPCS band. Panasonic also supports the proposal to reduce the number of channels a UPCS device must monitor in order to use the least-interfered channel access method from 40 to 20.

² MZA, Ltd., "World Consumer Cordless Telephony Market," April 2010. Data is for calendar year 2009. See: "**Panasonic Raises the Standard for Cordless Telephone Performance and Features**" (07/08/2010) at: <http://www.panasonic.com/pressroom>

³ The T3i report, InfoTrack for Enterprise Communications, reports that Panasonic achieved 17% market share for the U.S. market. The executive summary also notes that "Panasonic revenues grew due to a shift to IP-enhanced platforms." See: "**Panasonic Named Leader in Small Business Phone Systems for 2009 in North America**" (05/12/2010) at: <http://www.panasonic.com/pressroom>

DISCUSSION:

Panasonic commends the Commission for its proposed rules to adopt the changes sought by the DECT Forum in order to minimize the potential impact of out-of-band emissions from adjacent wireless services on consumers with UPCS-band customer premises equipment (“CPE”). In the North American market, DECT technologies have already achieved overwhelming market acceptance by consumers due to their interference-free operation and voice clarity. The Commission has long envisioned – and, indeed, has taken steps to promote – the development of advanced cordless telephone technologies in the 1.9 GHz UPCS band. This has proven to be an immensely productive decision, as devices operating in this band have become extremely popular with consumers. For this reason, Panasonic believes it would be in public interest for the Commission to act favorably and rapidly on the DECT Petition and we respectfully urge the Commission to do so.

Panasonic agrees with the Commission that the proposed changes to the UPCS band rules will not increase the potential for harmful interference to adjacent AWS and PCS devices.⁴ We also agree with the Commission’s observation that the “probability of interference occurring among UPCS devices operating under the proposed monitoring threshold or between such devices and those operating under the current monitoring threshold will remain low”.⁵ Manufacturers of cordless phones have a market incentive to design their products to use minimal power at all times. For example, Panasonic DECT phones use an “Intelligent Eco Mode” to automatically lower the power consumption when using the handset close to the base unit. Not only does this extend the available talk time and prolong battery life – features desired by consumers – it also reduces the probability of interference when two or more handsets are operating in close proximity.

⁴ NPRM at 15

⁵ NPRM at 15

Panasonic agrees that the Commission's proposal to reduce from 40 to 20 channels the number of channels that a UPCS device must monitor would "increase the utilization of the UPCS band by allowing wider-bandwidth devices to access channels that are usable under the least-interfered channel access criteria."⁶ The changes proposed by the Commission will support innovation in products and services by permitting broadband-connected products (using paired UPCS channels), with related advanced services such as broadband connectivity, streaming media, and improved audio quality. The DECT Forum has documented⁷ how these changes will enable DECT technologies to be used in important sectors of the economy – healthcare, home automation, and dense office environments – and help facilitate the ongoing transition from the "Plain Old Telephony Service" (POTS) to "All-IP" networks.

⁶ NPRM at 16

⁷ See Ex Parte Comments of the DECT Forum, DECT Forum Petition for Rulemaking, RM 11485; 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, Fostering Innovation and Investment in the Wireless Communications Market, GN Docket No. 09-157, A National Broadband Plan For Our Future, GN Docket No. 09-51 (filed Dec. 12, 2009).

CONCLUSION:

For the foregoing reasons, Panasonic believes it would be in the public interest for expeditious action by the Commission to approve its proposed changes to UPCS band rules in 47CFR15.323.

Respectfully submitted,

Panasonic Corporation of North America

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