

February 10, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: ET Docket No. 08-59, Amendment of the Commission's Rules to Provide  
Spectrum for the Operation of Medical Body Area Networks

Dear Ms. Dortch,

On February 8, 2012, representatives of Philips Healthcare ("Philips"), GE Healthcare ("GE"), the Aerospace & Flight Test Radio Coordinating Council ("AFTRCC") and the American Society for Healthcare Engineering of the American Hospital Association ("ASHE") (collectively, the "MBANS Parties") participated in a teleconference with staff of the Commission's Office of Engineering and Technology ("OET") concerning issues in the above-captioned proceeding. The meeting participants are listed in the Attachment to this letter.

During the call reference was made to the issues discussed in the MBANS Parties' filing in this Docket dated January 27, 2012. Specifically, it was pointed out that the new changes incorporated in the draft proposed rules would (1) provide for review of transition plans by the AMT coordinator as well as the MBANS coordinator, require consultation between the two coordinators in approving plans, and require annual updates to the plans; (2) provide that the healthcare facility and the vendor each be responsible for re-channeling the MBANS equipment if re-channeling should be necessary; (3) require explicitly that the healthcare facility, MBANS vendor, and MBANS coordinator cooperate with the AMT coordinator to identify and remedy interference; and (4) clarify that the 7-day notice requirement in proposed Section 95.1615(g)(F) applies when a temporary mobile AMT deployment is planned, as distinguished from construction of a new permanent AMT site, for which as much prior notice as possible should be given.

The MBANS Parties also stated that flexibility for transition plans is needed for each individual facility, rather than trying to impose a uniform transition plan that could not take account of specific locations and issues. Confidence was expressed that this is completely feasible using any one of multiple software propagation packages that are readily available. The parties also reiterated their continued agreement with the proposals filed by letter in this Docket by the Wireless Communications Association International ("WCAI") on January 28, 2011, including a change to footnote US276 proposed in that letter but inadvertently omitted in the draft rules proposal submitted on January 27, 2012.

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Finally, it was noted that AFTRCC might undergo a *pro forma* reorganization, e.g. incorporate, while maintaining its non-profit status.

Respectfully Submitted,

/s/

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/s/

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Attachment -- Participants

# **ATTACHMENT**

Participants on Teleconference of February 8, 2012

## **FCC Office of Engineering and Technology (OET)**

Geraldine Matise  
Rashmi Doshi  
Mark Settle  
Jamison Prime  
Brian Butler  
Steve Jones

## **Aerospace & Flight Test Radio Coordinating Council (AFTRCC)**

Ken Keane  
Dan Jablonski  
Darryl Holtmeyer  
Joe Cramer  
Don Hoehn  
Wayne Maynard  
Marc EHUDIN  
Bruce Olcott

## **GE Healthcare (GE)**

Neal Seidl  
Orrin Marcella

## **Philips Healthcare (Philips)**

David Siddall  
Delroy Smith  
Dong Wang

## **American Society for Healthcare Engineering of the American Hospital Association (ASHE)**

Dale Woodin  
John Collins  
Tim Cooney  
Larry Movshin  
Mark Gibson  
Laura Fontaine  
Stuart Katz