

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

In the Matter of

Request by Progeny LMS, LLC, for waiver of
certain multilateration location and monitoring
service rules.

WT Docket No. 11-49

Via the ECFS

REPLY COMMENTS OF IEEE 802

1. IEEE 802¹ respectfully submits its Comments in the above-captioned Proceeding².
2. IEEE 802, as a leading consensus-based industry standards body, produces standards for wireless networking devices, including wireless local area networks (“WLANs”), wireless personal area networks (“WPANs”), wireless metropolitan area networks (“Wireless MANs”), and wireless regional area networks (“WRANS”). Included in our standards development activity is an emphasis on coexistence, which is the focus of our Wireless Coexistence working group. We appreciate the opportunity to provide these comments to the FCC.

INTRODUCTION

3. On January 27, 2012, Progeny LMS, LLC (Progeny) filed a report in WT Docket No. 11-49 seeking to demonstrate that its Multilateration Location and Monitoring Service (“M-LMS”) network does not cause unacceptable levels of interference to Part 15 devices in the 902-928 MHz band.
4. IEEE 802 has a particular interest in the 902-928 MHz band, since the IEEE 802.11 Working Group (“802.11”) is developing an amendment to the base standard for sub-1 GHz operation of WLANs targeting this band, and the IEEE 802.15 Working Group (“802.15”)

¹ The IEEE Local and Metropolitan Area Networks Standards Committee (“IEEE 802” or the “LMSC”).

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has now finalized an amendment to the IEEE 802.15.4 base standard for WPANs specifically targeted at Smart Grid applications in this band which is expected to be published in the near future. In addition, previous equipment designed to comply with IEEE 802.15.4 is widely deployed in the marketplace.

5. In addition, we note that IEEE 802 has previously filed comments opposing the operation of M-LMS services in the 902-928 MHz band.

**IEEE 802 BELIEVES THAT PROGENY'S TEST REPORT FAILS TO ESTABLISH
THAT THEIR M-LMS EQUIPMENT DOES NOT INTERFERE WITH PART 15
DEVICES**

6. IEEE 802 supports the comments of Itron and Landis+Gyr challenging the adequacy of the test plan and the conclusions drawn in the Progeny test report.
7. We further believe that Progeny failed to engage the manufacturers of Part 15 equipment operating in the 902-928 MHz band in a dialog leading to a more effective interference test methodology, including more equipment types in the tests conducted.

CONCLUSION

8. IEEE 802 encourages the Commission to reject the conclusions drawn by Progeny in their test report. Our view is that Progeny has failed to meet the terms required by the Commission, namely, that Progeny demonstrate that its equipment does not cause unacceptable interference to Part 15 devices operating in the 902-928 MHz frequency band.

Respectfully submitted,

/s/

Michael Lynch
Chair, IEEE 802.18 Radio Regulatory Technical Advisory Group
108 Brentwood Court
Allen, TX 75013
972.814.4901
freqmgr@ieee.org

² This document represents the views of IEEE 802. It does not necessarily represent the views of the IEEE as a whole or the IEEE Standards Association as a whole.
