# COMMENT ON FCC NOTICE OF PROPOSED RULEMAKING

# ET DOCKET 10-23

## 1 REVISION HISTORY

| Issue | Date | Issued by | Modification |
|---|---|---|---|
| 1 | 120528 | EMw | Created |

## 2 COMPANY INFORMATION

Emerson (NYSE: EMR) is a diversified global manufacturing and technology company. We offer a wide range of products and services in the industrial, commercial and consumer markets through our Process Management, Industrial Automation, Network Power, Climate Technologies, and Commercial & Residential Solutions businesses. Recognized widely for our engineering capabilities and management excellence, Emerson has approximately 133,000 employees and 235 manufacturing locations worldwide.

Rosemount Tank Radar AB is a part of Emerson Process Management. Rosemount Tank Radar AB is the pioneer in applying radar technology to level measurement, and is now market leader in marine tank measurement, inventory tank gauging and among the top three market leaders in industrial tank measurement. Inventory tank gauging cover applications with high accuracy, typically oil storage tanks in refineries and depots, industrial tank gauging covers a wide variety of applications where the measurement and control of level is needed.

Total turnover of Rosemount Tank Radar AB worldwide is over 200 million $.

# 3 COMMENT

Emerson strongly supports the Notice of Proposed Rulemaking ET Docket 10-23 concerning level probing radars. We agree with the comments filed by MCAA in this matter.

Possible industrial applications include a large amount of open or semi-open tanks and containers where radar level gauging has a potential to be used, e.g. measurement on various solids in piles or open silos, level control of dams etc. Present lack of regulations on radar level gauging hinders the full utilization of the technology in these applications. A rulemaking as outlined in the FCC docket 10-23 and the MCAA comment would greatly help the full exploration of these applications.

An important aspect of the rulemaking – for the manufacturers – is to harmonize the FCC rules as much as possible to other existing standards, i.e. the ETSI standards EN 302 729 and 302 37. If this can be achieved it will help in having a cost efficient production of radar level gauge equipment.

We would also like to emphasize the continued need allowing for level probing radar mounted in a metallic tank to be qualified with the present FCC part 15.209 rules. In metallic tanks the need for accuracy and sensitivity is sometimes higher than open air measurements. The metallic tank effectively shield the radiofrequency, therefore the emission limits of 15.209 is easily kept even if the instrument itself would not pass the proposed rules for LPR according to ET Docket 10-23. To be able to continue to serve these applications with high performance radar level gauges we need to have the option using 15.209 for qualification of radar level gauges.

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