

**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**

Editorial Note: This document was approved by IEEE 802 prior to the Commission's announcement of the PN regarding the request for comments on Progeny LMS, LLC and their Petition for Waiver of the Rules And Request for Expedited Treatment. The Commission has begun the process that this document requested and this document should be considered as demonstrating IEEE 802's support for the actions begun in the Commission's PN .

**INTRODUCTION**

1. IEEE 802<sup>1</sup> respectfully requests that the FCC release a public notice inviting comments on the results of interference testing of Progeny M-LMS equipment with Part 15 equipment from WISPA, Landis+Gyr and Itron<sup>2</sup>.
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.

**BACKGROUND**

3. On October 31, 2012, Progeny LMS, LLC ("Progeny") filed three joint test reports, one with WISPA, one with Landis+Gyr, and one with Itron, detailing the results of tests conducted in the San Jose, CA, area in response to the Commission's requirement that

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<sup>1</sup> The IEEE Local and Metropolitan Area Networks Standards Committee ("IEEE 802" or the "LMSC").

<sup>2</sup> 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.

Progeny demonstrate that its Multilateration Location and Monitoring Service (“M-LMS”) network does not cause unacceptable levels of interference to Part 15 devices.

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 (P802.11ah), and the IEEE 802.15 Working Group (“802.15”) has recently published an amendment to the IEEE 802.15.4 base standard (IEEE Std. 802.15.4g-2012) for WPANs specifically targeted at Smart Grid applications in this band.
5. IEEE 802 believes that the testing completed in the above mentioned reports merit a serious review by all parties who have an interest in the results of these tests.
6. IEEE 802 requests that the Commission create a Public Notice inviting comments from interested parties on the findings of these test reports.

### **CONCLUSION**

7. IEEE 802 notes that unlicensed operations in the 902-928 MHz band include smart utility network applications, positive train control applications, and other industrial, commercial and public safety uses that have become indispensable to the proper functioning of the American economy. As a result, we believe that a full and fair review of the outcome of these tests will best serve the interest of all parties involved.

Respectfully submitted,

/s/

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