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FCC Mail Room

Marlene H. Dortch
Secretary Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554
1-888-225-5322

Regarding the Matter of Progeny LMS LLC, WT Docket No. 11-49: Notice of Oral Ex Parte Communication

Dear Ms. Dortch:

I am writing on behalf of Analog Devices, Inc. (ADI) to urge that the Commission defer authorizing Progeny LMS LLC ("Progeny") to operate in the 902-928 MHz band under its Multilateration Location and Monitoring Service ("M-LMS") license until Progeny satisfies its obligation under the Commission's Rules Section 90.353(d) "to demonstrate through actual field tests that [its] systems do not cause unacceptable levels of interference to 47 CFR part 15 devices." Additional testing is required to assess the impact and avoid adverse implications for innovative products and services in use throughout the electrical grid, hospitals, highway systems, advanced manufacturing facilities, and homes. ADI urges the Commission to require additional testing.

ADI is a leading supplier of semiconductors used in smart electronic meters, including low-power radio frequency (RF) transceivers and application-specific devices. In addition, our products serve many other short range and long range RF applications, including security systems, building automation, factory automation, medical instrumentation and patient monitoring, as well as metering and smart energy.

The availability of the unlicensed 902-928 MHz band has led to the creation of many new and innovative technologies with widespread societal benefits. One example is the smart electrical grid, or Smart Grid. The Smart Grid requires an advanced metering infrastructure (AMI) made up of millions of smart electronic meters, or smart e-meters. Millions of smart e-meters deployed throughout the United States rely on a robust communications link between the individual meters and the data concentrators which aggregate meter data in a neighborhood area. Utilities require that the smart e-meters be read with high reliability, typically in excess of 99%. Rigorous testing prior to commercial deployment of Progeny's system is needed to ensure that the proposed Progeny devices will not cause unacceptable interference to these Part 15 devices and threaten the performance of the electric grid, which is of the utmost importance to our society.

Progeny should prove that its systems do not generate unacceptable interference to existing 902-928 MHz Part 15 devices. Progeny testing has been limited and has not been performed under rigorous industry defined conditions to assess the effect on other Part 15 devices; and in some cases, these limited tests have actually shown to negatively impact existing Part 15 devices. Based on this limited testing, Progeny has failed to meet its burden of showing that its system will not cause unacceptable interference.

In summary, any risks that Progeny's systems poses to these technologies in 902-928 MHz band should be fully understood and contemplated before Progeny's systems are allowed to be deployed. We urge the Commission to undertake additional testing or at a minimum, to impose strict and meaningful requirements on Progeny's system to help ensure that interference is minimized for unlicensed users in the 902-928 MHz band.

Respectfully submitted,


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