

December 11, 2013

BY ELECTRONIC DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

**Re: Inovonics Wireless Corporation & Progeny LMS, LLC
Permitted Written *Ex Parte* Presentation
WT Docket No. 11-49**

Dear Ms. Dortch:

This letter is being filed by Inovonics Wireless Corporation (“Inovonics”) and Progeny LMS, LLC (“Progeny”) regarding the results of joint tests that were conducted by the parties on their respective 900 MHz systems in Santa Clara County in October 2013. On March 18, 2013, Inovonics sent a letter to Progeny requesting that the two companies engage in joint testing to determine whether the operation of Progeny’s Multilateration Location and Monitoring Service (“M-LMS”) would have an impact on Inovonics’ Part 15 products, which include emergency call alarm systems for seniors in Assisted Living and Independent Living campuses and emergency mobile duress systems for panic alarms used in hospitals, hotels, K-12 schools and higher education campuses.¹ On June 24, 2013, Progeny sent a responsive letter to Inovonics requesting a meeting to conduct technical discussions that led to the joint tests.

The joint tests were conducted primarily to determine whether Inovonics products were susceptible to potential overload or desensitization in the presence of a collocated Progeny beacon, to assess any adjacent channel interference impact, and to assess the overall performance of Inovonics’ tested products including panic alarm success rate in the presence of multiple Progeny beacons. Inovonics used some of its representative products in the tests, which were conducted both close to and in the same building (effectively collocated) with a Progeny M-LMS beacon transmitter.

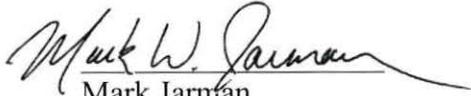
Following the tests, the parties concurred that the tests indicated that the Progeny M-LMS transmissions did not desensitize Inovonics’ tested products, there was no measurable impact on adjacent channel system performance, and Inovonics’ use of frequency hopping spread spectrum (“FHSS”) technology and retransmission algorithms effectively accommodated Progeny’s co-

¹ See Letter from Mark Jarman, President, Inovonics Corp., to Gary Parsons, Chief Executive Officer, NextNav LLC (March 18, 2013), *included as an attachment to* Letter from Laura Stefani, Attorney for Inovonics, to Ms. Marlene H. Dortch, Secretary, Federal Communications Commission, WT Docket No. 11-49 (Apr. 16, 2013).

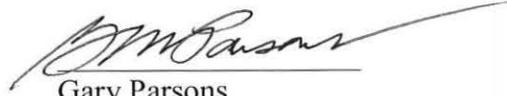
frequency transmissions without impacting system performance or alarm success rate. However, the testing only assessed the impact of Progeny's beacon transmission within its licensed M-LMS spectrum, and was not intended to consider the impact of additional deployments of such licensed channel technologies in other of the M-LMS band, or even other 900 MHz unlicensed bands.

Thank you for your attention to this matter. Please contact the undersigned if you have any questions.

Sincerely,



Mark Jarnfan
President
Inovonics Wireless Corp.



Gary Parsons
Chief Executive Officer
Progeny LMS, LLC