



Matsushita

Communication

Industrial Co., Ltd.

4-3-1 Tsunashima-higashi, kohoku-ku, Yokohama, 223-8639 Japan

Tel:+81-45-531-1231 Fax:+81-45-542-5105

<http://www.mci.panasonic.co.jp>

28 September 2001

Comments On 3G Further Notice of Proposed Rule Making

Dockets 00-258, 95-18, 99-81

I am Masaharu Nakatomi of the Mobile Communications Company of Matsushita Communication Industrial Co., Ltd., better known in the USA by our Panasonic brand. As a manufacturer of wireless devices, Panasonic is clearly interested in any possibility that expands available spectrum for commercial purposes and we urge the Commission to quickly act to allocate additional spectrum for 3G uses. We understand that the major complexity of this proceeding arises from the need to find between 100MHz and 200MHz of spectrum for high power paired applications and, as we are not highly familiar with the considerations associated with the incumbent uses of these frequencies, we will not comment on those.

On the other hand, Panasonic has very considerable experience with private, unlicensed wireless products and we urge the Commission to act quickly to change the Unlicensed PCS etiquette and power level rules to allow PHS and other globally standard protocols to be used in PBX applications in the United States. Panasonic telecommunications equipment is very popular with small businesses in the United States and around the world. At present, our solution in the United States does not include any multi-cell wireless solution. We had determined that the cost to provide such a capability in the United States, based on the Unlicensed PCS rules in the 1910 - 1930MHz band, would make any solution unattractive to our customers. With this proceeding, the Commission is asking for comments that could change that status. Panasonic has considerable experience with PHS wireless equipment sold in Asia including Japan. This equipment, which is in high volume production for many countries, could provide a very cost effective in-building wireless solution such as wireless PBX if it were allowed to be sold in the United States. In addition to Panasonic equipment, we believe that US

Consumers could benefit from the use of handsets from multiple vendors on their systems. This would give them choice in function as well as a mechanism to compare prices of different units from different suppliers. This compares to the current US Unlicensed Voice Wireless market where, once a specific system is deployed, only phones from the vendor of that system will work with the system. This has resulted in high consumer prices for expensive, low volume wireless products and the result has been small demand. If the Commission approves rule changes that allow internationally standard products to operate in the unlicensed band (1910MHz – 1930MHz), US Consumers should immediately see the benefits of more choice and lower prices.

Panasonic urges the Commission to separate rule making for the 1910 – 1920MHz (or 1910 – 1930MHz) band from the more complex remainder of this proceeding and rapidly issue new rules that will allow for cost effective deployment of PHS or other low power technologies for businesses in the United States.