

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Additional Spectrum for)	ET Docket No. 02-380
Unlicensed Devices Below)	
900 MHz and in the 3 GHz Band)	
)	

**REPLY COMMENTS OF THE AMERICAN HOSPITAL
ASSOCIATION TASK FORCE ON MEDICAL TELEMETRY**

The American Hospital Association Task Force on Medical Telemetry (“AHA Task Force”), by its attorneys and pursuant to Sections 1.415 and 1.430 of the Commission’s rules, hereby files comments in reply to the initial comments filed in the above-captioned proceeding.¹

The Commission initiated this proceeding to obtain comments from the public on the possibility of permitting unlicensed devices to operate in portions of the TV broadcast band and, if so, what portions.² The Commission also asked whether there are certain frequencies in which unlicensed devices should not be permitted to operate. In particular, the Commission noted that TV channel 37 (608-614 MHz) is allocated for radio astronomy operations and Wireless Medical Telemetry Service (“WMTS”) and that unlicensed operations on this channel may not be appropriate because of special interference concerns associated with the critical safety function of WMTS equipment.³

¹ *Additional Spectrum for Unlicensed Devices Below 900 MHz and in the 3 GHz Bank*, Notice of Inquiry, FCC 02-328, ET Docket No. 02-380 (“Notice”).

² *Id.* at paras. 1, 14.

³ *Id.* at para. 14.

In its initial comments, the Philips Medical Systems division of Philips Electronics North America Corp. (“Philips”) explained that unlicensed transmitters pose a significant risk of interference with critical patient monitoring activities.⁴ This risk would be exacerbated by the unlicensed nature of the proposed operations, which makes it nearly impossible to identify or control the source of interference. Thus, Philips recommends that the Commission prohibit unlicensed transmitters on those television channels (channel 37 and adjacent channels 36 and 38) where they are likely to interfere with WMTS transmissions.

The AHA Task Force supports Philips’ initial comments. In creating WMTS in 2000 the Commission stated that its objectives included “allow[ing] potentially life-critical medical telemetry equipment to operate on an interference-protected basis” and to “improve the reliability of this service.”⁵ The Commission stated that “[a] specific allocation [to WMTS] is necessary in this case to protect the public safety by providing spectrum where medical telemetry equipment can operate without interference.”⁶

It would be inconsistent with the Commission’s express intention to shield life-critical WMTS operations from interference (as much as reasonably possible) if the Commission were to allow unlicensed operations on TV channels 36-38. This is particularly true since WMTS devices are themselves highly sensitive low power transceivers. Unlike most other licensed services, whose very high powered operations might discourage most lower-powered, unlicensed operations, the WMTS would be uniquely susceptible to interference from other devices operating in the band. The AHA Task Force, therefore, supports Philips’ initial comments and

⁴ *Initial Comments of Philips Medical Systems*, ET Docket No. 02-380, May 17, 2003, at 2.

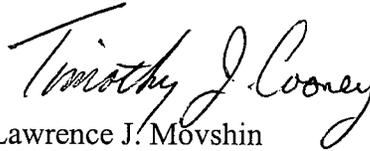
⁵ *Amendment of Parts 2 and 95 of the Commission’s Rules to Create a Wireless Medical Telemetry Service*, 15 FCC Rcd 11206 (2000).

⁶ *Id.* at para. 11.

endorses its recommendation to prohibit unlicensed transmitters on TV channel 37 and adjacent TV channels 36 and 38 for the technical reasons explained by Philips.

Respectfully submitted,

**AMERICAN HOSPITAL ASSOCIATION
TASK FORCE ON MEDICAL TELEMETRY**



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