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Federal Communications Commission
 Office of Secretary

Mr. Edmond J. Thomas
 Chief, Office of Engineering and Technology
 Federal Communications Commission
 445-12th Street, S.W.
 Washington, D.C. 20554

Re: WT Docket No. 02-55; Interference to Public Safety
 Receivers in the 800 MHz band; Your Letter of April 18, 2003.

Dear Mr. Thomas:

On behalf of Kenwood U.S.A. Corporation, this is in response to your letter of April 18, 2003. Kenwood is grateful for the opportunity to respond to your inquiry on this important subject, prior to the Commission's determination of the complex issue of interference from low-site architecture to public safety systems in the 800 MHz band. Kenwood manufactures mobile and portable products for public safety use at 800 MHz, and for commercial, business/industrial and land transportation use. Though Kenwood has previously filed comments in this proceeding on two occasions, we appreciate the opportunity to further address "practical, technical or procedural solutions or information not yet on the public record" that we believe the Commission should consider.

Kenwood has taken the position that the proposed restructuring of the entire 800 MHz band is neither a necessary nor desirable solution to the admittedly complex interference problem involving public safety systems at 800 MHz. The reason for this position is twofold: (1) Kenwood is not of the view that receiver technology is the major contributor to interference problems at 800 MHz;¹ and (2) wholesale restructuring of the 800 MHz band is inherently inequitable and benefits only cellular-architecture systems, impairing what remaining competition exists in CMRS service in this band. Kenwood

¹ Kenwood makes two 800 MHz products, the TK480 portable, which has an intermodulation distortion specification of 65 dB, selectivity of 70 dB, and spurious rejection of 70 dB. The TK980 mobile radio has an intermodulation distortion specification of 70 dB, selectivity of 75 dB, and spurious rejection of 80 dB. Kenwood believes these to be reasonable standards.

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Mr. Edmond J. Thomas
Page Two
May 8, 2003

believes that the application of standard remedies and procedures for interference resolution will suffice until normal migration to the 700 MHz band by public safety systems can occur. However, the Commission must make sure that those standard remedies are implemented now, so that interference at 800 MHz to public safety is ameliorated.

Restructuring the band now might contribute to reduction of interference, but there is a substantial cost to incumbent high-site architecture systems in doing so. This cost is not proposed to be sufficiently reimbursed. In the case of SMR licensees in this band, the disruption to customers in the process will inevitably doom the licensee's ability to compete with cellular architecture CMRS systems. This is fundamentally unfair and anticompetitive and should be avoided.

Kenwood favors a less radical approach. First, the Commission should adopt the policy that the interfering licensee remedy reported interference to public safety systems, even if the interfering equipment is operating within current technical specifications. The Commission should require that the interference be substantially eliminated within 60 days after the interfering licensee is contacted by the public safety licensee. Second, a technical standard should be adopted defining what constitutes harmful interference in this context. Since public safety systems are the victim of the interference, the standard should be rigorous. The regulations should provide for external filtering and other added equipment to be used to reduce or eliminate interference.

Kenwood has also in the past recommended adoption of the technical standards set forth in the "APCO Best Practices Guide". At the same time, however, licensees of low-site architecture systems should be required to reduce transmitter ERP to a reasonable level, for example, 10 watts per channel. This would provide a substantial reduction in intermodulation interference, while still allowing the low-site system to continue to operate effectively across its coverage area. The definition of "low site" systems can be similar to cellular systems, the critical element of which is that the antennas are at a height of less than 100 feet AGL, and above average terrain (HAAT) of less than 40 meters. Other standards could include application of the 700 MHz sideband rules to low sites meeting the above definition, and establishment of out-of-band emission standards for base station transmitters.

As well, Commission rules should require advance notification by low-site licensees, both to 800/900 MHz frequency coordinators, and to all public safety licensees within a 70-mile radius well in advance of initiating transmissions from a new low site. This would be similar to the PCN notifications that are provided under the Part 101 rules, and which have just been required for fixed broadcast auxiliary licensing under Part 74. Public safety licensees should not be required to discover by trial and error that a new

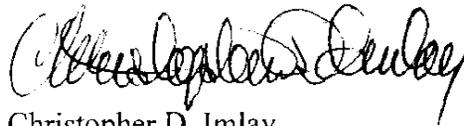
Mr. Edmond J. Thomas
Page Three
May 8, 2003

low-site facility has been initiated and that interference has resulted. The notice should contain contact information for technical interference resolution joint efforts.

Kenwood believes that forced wholesale band restructuring is neither necessary in the short term or the long term to address interference incidents, nor a desirable solution. It would be disruptive in the extreme to incumbent licensees in all categories. It would work irreversible hardship on incumbent licensees which are not involved in the interference problems, and which are attempting to compete with larger CMRS entities, which is a difficult task at best.

Kenwood appreciates the opportunity to provide these further views in response to your April 18, 2003 letter. Should further information be required, please contact the undersigned.

Yours very truly,

A handwritten signature in black ink, appearing to read "Christopher D. Imlay". The signature is written in a cursive, flowing style.

Christopher D. Imlay
Kenwood Regulatory Attorney

Cc: Mr. Joe Watts
Kenwood USA Corporation