

The Motorola findings concerning the effects of and advantages of the switched attenuator and program controlled filtering are very relevant to a solution for the problem of CMRS interference to Public Safety. In fact, the Motorola findings are not surprising given that they reflect well known and basic receiver design theory.

Often, the application of design elements is driven by a combination of user need and cost effectiveness. Prior to the introduction of CMRS type systems in the lower 800 MHz spectrum, neither the user need nor cost effectiveness demanded such technology be incorporated into Public Safety products. However, with the introduction of the CMRS systems, the need now presents itself. Fortunately, advancing manufacturing technology apparently now makes it possible for vendors such as Motorola to incorporate these design enhancements with negligible increase in user cost of equipment, an issue of concern to Public Safety with its increasingly difficult budgeting climate.

While I believe the best "write your own deal" solution from a Public Safety perspective would be to move CMRS out of the lower 800 MHz spectrum, the scarcity and value of alternative spectrum makes this very difficult. To provide this solution would mean providing a windfall value in spectrum to one carrier, a situation that might take years of court challenges to settle, if ever. The technology solution provides an almost immediate solution that can be applied when and where required.

At the very least, I believe the FCC should delay consideration of the "Consensus Plan" pending sufficient field trial of this relatively inexpensive solution. My belief is, this will prove to be an adequate, cost effective solution to the issue. In fact, I believe that the success of this solution will be reflected in future design of products serving many applications beyond Public Safety. This is certainly an example of need being the mother of invention.

I recommend that 800 MHz Public Safety system operators consider the advantages of cost and stability this solution provides, and speak as a group to the FCC, recommending the delay of a decision until more data is available on the mitigation offered by this solution. Additionally, after sufficient study, if the solution is found to resolve the issue, the users and industry should work together to see that these technologies do become a part of a Best Practices standard.

Henrik Rasmussen
Communications Maintenance Administrator
City of Durham, NC