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December 10, 2003

Ms Marlene H Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W
Room TW-A325
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re ET Docket No 00-258

Dear Ms Dortch:

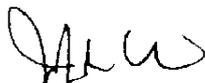
On December 10, 2003, Mark Esherick, Director of Government Relations, Siemens Corporation; Rick Krupka, Director, Siemens Information Carrier Mobile, Barry Rosenblatt, Philips, Tom Patton, Manager, Philips; Stephen Berger, President, TEM Consulting, LP, Mike Stima, Director, UTAM, Mark Racek, Manager, Ericsson, Eric DeSilva, Director, UTAM, Inc. and Dag Åkerberg, Manager, Ericsson and DECT Tech. WG and Erich Kamperschroer, Manager, Technology, Siemens AG / Chairman, DECT Forum, Switzerland met with Geraldine Maise, Bruce Franca, Jamison Prime and Ira Keltz of the Office of Engineering and Technology to discuss issues related to the above referenced proceeding

Specifically, Siemens discussed the benefits to U.S. consumers of introducing DECT products to the U.S. marketplace and modifications of rules contained in Part 15 necessary to accomplish this goal including:

- Remove fixed channelization,
- Set maximum bandwidth of 2.5 MHz,
- Extend the isochronous band down to 1915 MHz,
- Remove the packing rule, section 15.323 (b).

If you have any questions, please contact me at 202-434-4803

Sincerely,



Mark Esherick
Director of Government Affairs



Enclosures

Cc: Geraldine Matise
Bruce Franca
Jamison Prime
Ira Keltz



*DECT Forum Ex Parte
on ET Docket 00-258*

**DECT Forum
Recommendations for Revision
of the rules
for the
Unlicensed Personal
Communications Services
(UPCS)
Frequency Band**



Participants

- | | | | |
|-----------------------|------------|----------------|--------------------------------------|
| • Erich Kamperschroer | DECT Forum | • Mike Stima | UTAM |
| • Mark Esherick | Siemens | • Rick Krupka | Siemens |
| • Barry Rosenblatt | Philips | • Mark Racek | Ericsson |
| • Tom Patton | Philips | • Eric DeSilva | UTAM |
| • Stephen Berger | TEM | • Dag Åkerberg | Ericsson &
DECT Forum
Tech. WG |

Worldwide Deployment



America: 20 countries Europe: 48 countries

Africa: 26 countries Asia-Pacific: 22 countries

Recommendations

- Remove fixed channelization
- Set maximum bandwidth of 2.5 MHz
- Extend the isochronous band down to 1915 MHz
- Remove the packing rule, section 15.323 (b)

Removed fixed channelization

- Section 15.323 (a) fixes channels at 1.25 MHz.
- Fixed channels use spectrum inefficiently.
- Fixed channels should be replaced with a maximum bandwidth requirement.
- A maximum bandwidth requirement allows services to use the spectrum they need and only that spectrum.

Set maximum bandwidth of 2.5 MHz

- Current fixed channels indirectly require a maximum bandwidth of 1.25 MHz.
- UPCS Asynchronous Band (1900-1910 MHz) rules allows a bandwidth of up to 10 MHz.
- The isochronous rules provide for coexistence both in the frequency and time domains.
- *Thus, a maximum bandwidth of 2.5 MHz provides a reasonable limit to support technological development.*

Extend Band down to 1915 MHz

- The isochronous UPCS band etiquette provides unique properties, which enable reliable coexistence of real time speech and data services in an unlicensed spectrum.
- Such “protection” is not given by the popular ISM bands (2.4 and 5 GHz).
- There is a strong demand for high quality real-time voice and data services.
- A 15 MHz band, dedicated isochronous band provides enhanced service for these applications.
- A 15 MHz band provides a guard band between PCS band TX and RX.

Remove Packing Rule

- The rule 15.323 (b) packs services near the band edges.
- Consequence: UPCS services operate as near as possible to the PCS band.
- Removing this rule will allow services to move away from the band edge and hence decrease possible interference with PCS services.



Update of ANSI C63.17

Delegated authority should be given to accept revisions to ANSI C63.17, in support of these proposals.

Conclusions

- **Summary of Recommendations**
 - Allow Flexible channelization
 - Set maximum bandwidth of 2.5 MHz
 - Extend isochronous band down to 1915 MHz
 - Remove the packing rule
- **Recommendations support:**
 - Effective use of this spectrum
 - High quality voice and data services.
 - Technological development

DEFECT
FORUM



DECT

F O R U M

Supplement Information

The following slides
provide additional
background.



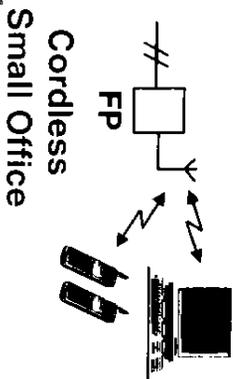
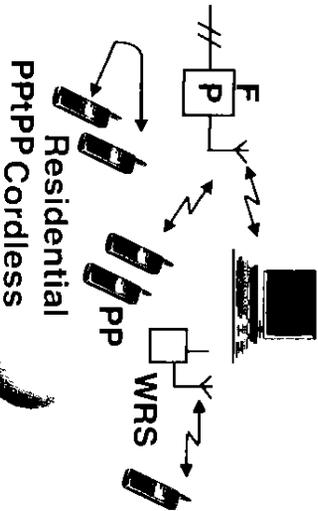
Introduction to DECT

- DECT "Digital Enhanced Cordless Telecommunications".
- A radio technology suited for voice, data and networking applications with range requirements up to a few hundred meters.
- Standardized by ETSI in 1992.
- International specification for short-range cordless telephones, wireless PBXs, public access service and other wireless local loop offerings.
- Accepted in more than 110 countries.
- Over 120 million products.

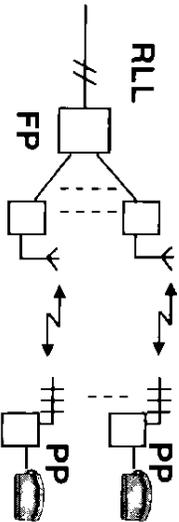
DECT

FORUM

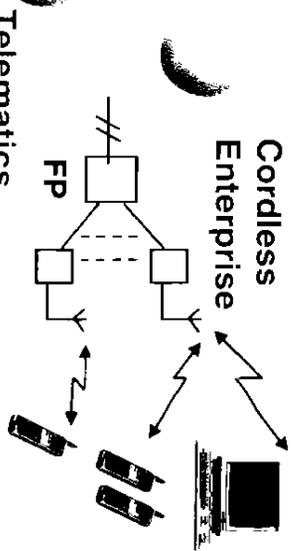
DECT Solutions



Wireless Local Loop



The World of DECT



Telematics,
Machine to Machine,
Industrial





Introduction to the DECT Forum

- **The DECT Forum is an international industry association embracing suppliers and operators of DECT based terminals, systems, and networks.**
- **The purpose of the DECT Forum is:**
 - **To promote DECT as the worldwide cordless standard.**
 - **Pursue worldwide harmonization of frequencies.**
 - **To provide an interactive forum for sharing information and experience between regulatory and standardization agencies, operators, users and manufacturers.**
 - **To manage the evolution of DECT in a way which protects legacy investments and permits orderly service migration and expansion.**

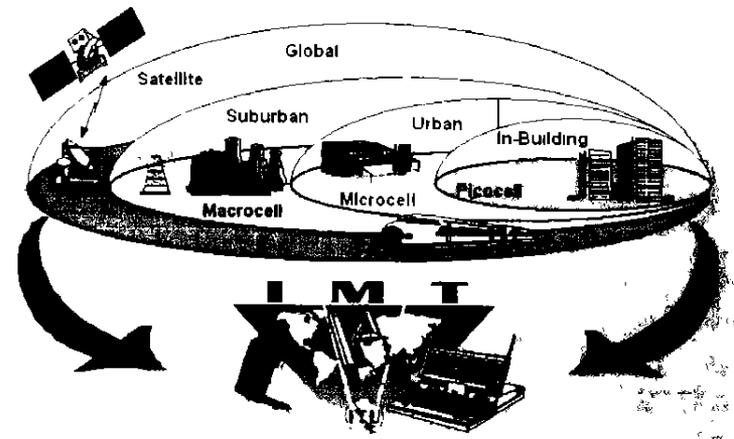
Vision for the UPCS Band

- An unlicensed band optimized for voice and multimedia traffic.
- RF requirements optimized for residential, small business in-building and small area applications.
- IMT-2000 family member optimized for uncoordinated use in unlicensed spectrum.
- Band etiquette provides an ongoing means to optimize band and deal effectively with interference.

IMT-2000 Coordination

IMT-2000

THE emerging network of the 21st century



IMT-2000 CDMA Direct Spread	IMT-2000 CDMA Multi-Carrier	IMT-2000 CDMA TDD	IMT-2000 TDMA Single Carrier	IMT-2000 FDMA/ TDMA
WCDMA (UMTS)	CDMA2000 1X and 3X	UTRA TDD and TD-SCDMA	UWC-136/ EDGE	DECT

Benefits to Consumers

- **Low Cost for High Quality Cordless Phone**
 - Economies of Scale (50 million DECT /year)
- **High Capacity for Voice Quality**
 - Better Utilization of Bandwidth
 - CD Quality Voice & User Features
- **Coordination with Wireless LAN Standards**
- **High Voice Security Standards**
 - encryption technology built in

Harmonization of Frequency

1880 1890 1900 1910 1920 1930 MHz

Europe, New Zealand, Australia, Asia (partly), Africa (partly)			
South Africa			
	China		
		(South) America	
		Proposed for US	



Set maximum bandwidth of 2.5 MHz

- DECT uses 1.7 MHz carrier spacing.
- 2.5 MHz bandwidth allows improved range.
- A maximum bandwidth of 2.5 MHz will support future technology innovations.
- *A maximum bandwidth of 2.5 MHz is recommended.*