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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 30, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TWB-204
Washington, D.C. 20554

Re: Ex Parte Notice, ET Docket No. 00-258

Dear Secretary Dortch:

On April 29th, Rick Krupka, Mark Esherick and Stephen Berger representing Siemens and the DECT Forum met with Bruce Franca, Jamison Prime, Karen Rackley, and Patrick Forster of the Office of Engineering and Technology to discuss issues associated with the above-referenced proceeding. In particular, we provided information responding to VTECH's objections to rule changes proposed by the DECT FORUM for the Unlicensed Personal Communications Services (UPCS) frequency band. A copy of the presentation supported by the DECT Forum is attached for inclusion in the record of this proceeding.

If you have any questions, please let me know.

Sincerely,



Mark Esherick
Director of Government Relations
Siemens Corporation

Attachment
cc: Bruce Franca

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

**Rationale for Optimizing
the UPCS Band
for
Real Time Services**

Presented – April 29, 2004

Outline

- Review of DECT Forum proposals
- VTech objections to Proposals
- DECT Forum responses

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)

VTech Objections

- VTech has over 25% of the cordless telephone market share and is No. 1 in both revenue and number of units sold.
- VTech asserts that these proposals add confusion with no added benefit to the consumer.
- VTech also makes DECT products for the European market.



VTech Objections

- **VTech contends that the DECT Forum proposals would:**
 - Have not had a thorough airing and will negatively impact channel availability for existing UPCS equipment.
 - DECT doesn't need to use UPCS band but can operate in the ISM bands.
 - False and misleading claims of higher voice quality and "protected spectrum".
 - Intent of several other proposals is to increase number of UPCS channels available for voice applications.
 - DECT Forum proposal would eliminate fixed channels and expand per-channel bandwidth from 1.25 to 2.5 MHz Results in 2 or 3 UPCS channels being unavailable for each DECT channel in use

DECT

F O R U M

DECT Forum Position

- **Choice is good for the consumer.**
- **The proposed rule changes have been publicly aired through the FCC rulemaking process.**
- **The DECT Forum proposal was first submitted to UTAM and is supported by them.**

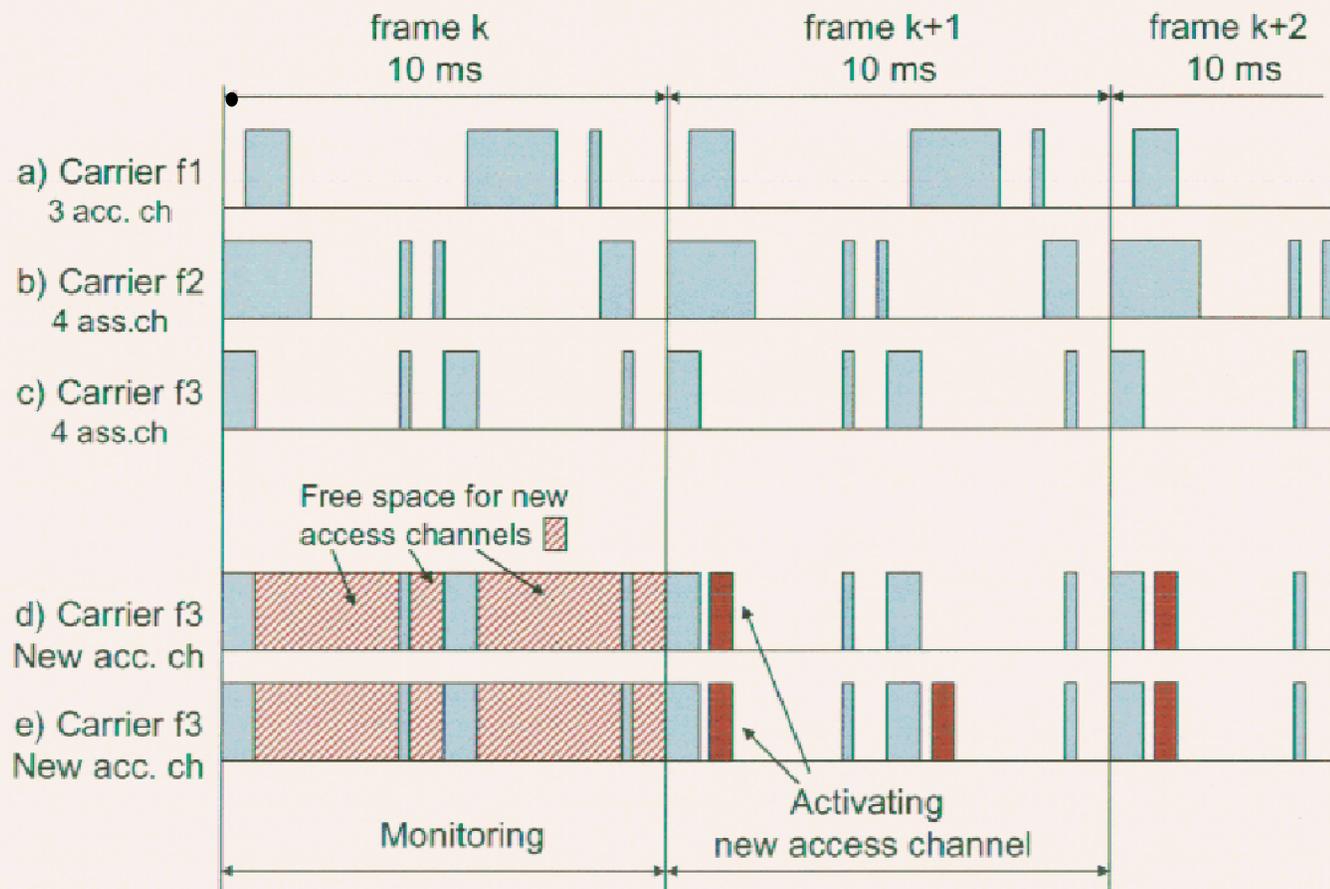


DECT Forum Position

- DECT could use the ISM bands but those bands are not optimised for real time performance.
- The ISM band rules cannot assure a transmission timeslot will be free. Therefore, coordination of transmissions cannot be coordinated.

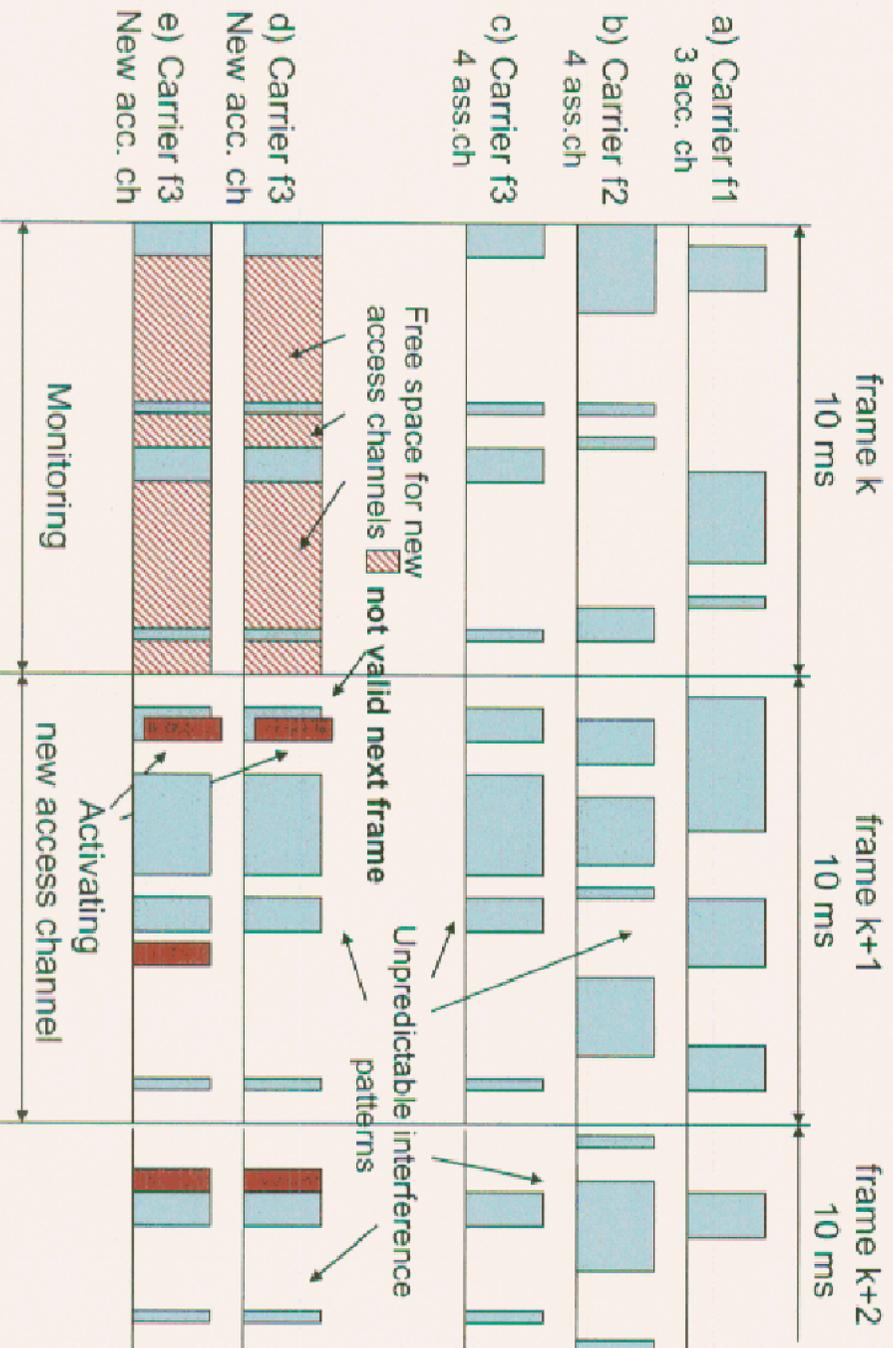
Isochronous UPCS access channels

Coexistence of isochronous UPCS access channels and setting up new channel



ISM Band Access

ISM band rules - Interference patterns unpredictable for consecutive frames



Summary

- The isochronous services of the UPCS band are needed and demand for more spectrum for real time services is increasing.
- UPCS band could be a spectrum area where new voice services can operate, providing consumers with additional choices and improved value.
- Amended UPCS rules, as proposed by the DECT Forum, will accommodate present candidate technologies as well as future applications.