

UTAM, Inc.

1170 US Highway 22 · PO Box 8126 · Bridgewater, New Jersey 08807

June 9, 2004

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: *Ex Parte*, ET Docket 00-258

Dear Ms. Dortch:

UTAM, Inc. (“UTAM”) is filing this letter in response to the *ex parte* “Comments on Use of the UPCS Bands,” submitted in the above-referenced docket on April 2, 2004 by VTech, Inc. (“VTech Presentation”). The VTech Presentation opposes certain rule modifications to permit the introduction of technologies based on the Digital Enhanced Cordless Telecommunications (“DECT”) specification in the unlicensed Personal Communications Services (“UPCS”) bands. VTech’s opposition to the proposed DECT changes, which are the result of a compromise negotiated between UTAM and the DECT Forum, is unfounded.

The genesis of the compromise proposal submitted by the DECT Forum was an opposition filed to prior DECT manufacturer comments by UTAM. In the wake of that filing, the DECT Forum, on behalf of its DECT manufacturer members, and UTAM, on behalf of the existing UPCS device manufacturers, convened several technical sessions to determine whether the use of the UPCS band could be expanded in a manner suitable for deployment of DECT systems without causing harmful interference to existing UPCS device users or future UPCS device installations. VTech is not a current manufacturer of UPCS devices, nor does it apparently seek to offer DECT products in the United States. VTech’s attempt, therefore, to assert a position purportedly protecting existing UPCS systems—even in the face of UTAM’s support—is somewhat puzzling. UTAM represents all of the manufacturers of UPCS devices in the United States, and UTAM’s board unanimously supported the recommendation of UTAM’s technical subcommittee to concur in the DECT Forum compromise proposal.

UTAM, Inc.

Ms. Marlene H. Dortch, Secretary
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Page 2 of 2

VTech also asserts that the compromise proposal was inadequately “aired.” The original proposal for implementation of DECT at 1910-1930 MHz, however, was in direct response to the FCC NPRM soliciting comment on alternative uses of the UPCS band. UTAM’s opposition to those comments, as well as the compromise plan itself, were submitted on the record and are certainly within the broader framework of the rules proposals placed on notice by the Commission in the NPRM.

Should any questions arise concerning this *ex parte*, please do not hesitate to contact the undersigned at (908) 526-3636.

Respectfully submitted,

UTAM, Inc.

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