

RFM response

Here are RFM's comments below. Just a reminder, RFM's corporate headquarters is in Dallas and our European office is in the UK. RFM's president is from Scotland. RFM has been an LPRA member since the first year, as I recall. RFM is very concerned the RA proposal is a big mistake that will do serious economical damage to the SRD industry in the UK and elsewhere, and will turn into a gigantic PR headache for the RA that will make the RA's TETRA/keyfob experience trivial in comparison. Our notes are numbered like the questions below:

1. There is a definite risk that allowing other services into the SRD allocations will make the UK a LESS desirable location for "wireless enhanced commerce". Consider wireless LANs (802.11b, etc.) which are now growing explosively. Business people worldwide are very quickly becoming accustomed to the convenience of using their laptops networked from anywhere in the office/home. Following shortly may be significant Bluetooth peripheral and mobile phone connectivity. The RF Industry is working hard to get these spread spectrum systems to coexist without having to deal with yet another type of service being overlaid in the same spectrum. The 433 and 869 MHz SRD allocation are already used extensively for vehicle RKE and many other remote control and data telemetry applications. The RA has endured one firestorm of public protest when TETRA began disabling vehicle RKE/immobilizer operation. The SRD industry in the UK has invested heavily in equipment redesigns to reject the out of band TETRA interference. In-band interference is a completely different matter. There is no practical way to deal with in-band interference without enormous engineering costs to the SRD industry. Most SRDs are powered by primary batteries and thus have to operate on low current to preserve battery life. Design techniques that would make SRDs less prone to in-band interference require more current, compromising battery life. And there is no practical solution to the potential disruption of hundreds of thousands of SRD systems now in daily use.

2. The majority of SRD applications are mobile - vehicle RKE systems, mobile phones, sports and medical physiological monitoring equipment, etc. all travel with the user. From the user's point of view, interference can occur anytime he/she travels close to one of the proposed "public telecom services". Geography is not the point, the users experience is the point.

3. Allowing additional services into the SRD band will create interference with SRDs and will congest the SRD bands.

4. No co-ordination with "channel access techniques" have ever be required for SRDs. Channel access techniques will do nothing to reduce the interference potential to SRDs.

5. No comment.

6. No comment.

7. No SRD band can be "shared" with a public telecom service without risk of serious interference with SRDs.

8. Unlicensed does not mean unimportant! SRDs are used extensively by the public already, again using vehicle RKE/immobilizers and WLANs as examples. Overlaying other services on these widely used and/or fast growing applications could create a serious backlash from the public toward both the RA and the new proposed public telcom services.

9. No comment.

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