

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )  
 )  
Preliminary Views on ) DA 04-1698  
WRC-07 Issues )

**COMMENTS OF ITRON, INC.**

Itron, Inc. (“Itron”), by its attorneys and pursuant to the above-captioned Public Notice, hereby comments on the draft preliminary view for Agenda Item 1.17 of the 2007 World Radiocommunication Conference (“WRC-2007”). In particular, Itron asks that the Commission, in developing a position concerning Agenda Item 1.17, take into account the potential for non-GSO MSS (“Little LEO”) downlinks to interfere with wireless medical telemetry and non-medical telemetry services operating in the 1427-1432 MHz band. Itron manufactures utility telemetry devices that operate in this band.

**DISCUSSION**

At WRC-2003, the 1390-1392 MHz and 1430-1432 MHz bands were allocated on a secondary basis for Little LEO feeder links. Under Resolution 745, however, the allocation cannot be implemented until ITU-R studies have been completed and the results of those studies have been reported to WRC-2007, and it is contemplated that additional provisions may have to be adopted to protect other services against interference from the Little LEO feeder links. Agenda Item 1.17, which is the vehicle for addressing Little LEO feeder link issues at WRC-2007, calls for WRC-2007 “to consider the results of ITU-R studies on compatibility between the fixed-satellite service and other services around 1.4 GHz, in accordance with Resolution 745.”<sup>1</sup>

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<sup>1</sup> Public Notice at 32.

The Radio Conference Subcommittee (“RCS”) of the National Telecommunications and Information Administration (“NTIA”) has prepared a draft preliminary view for Agenda Item 1.17. The RCS has recognized that “additional allocations in the [1.4 GHz] frequency region are quite complicated as many other services are potentially impacted.”<sup>2</sup> Accordingly, the RCS’ draft preliminary view provides that “[u]pon the successful completion of these [ITU-R] studies” there should be “implementation of appropriate provisions in the Radio Regulations to protect existing [1.4 GHz] services.”<sup>3</sup>

Itron agrees with this position in principle, and in particular commends the RCS for its focus on protecting existing services. Itron also, however, suggests some refinements to the proposed position.

First, Itron recommends that the phrase “[u]pon the successful completion of these studies” be replaced with the phrase “[i]f these studies show that sharing is possible.” By assuming that there will be a “successful completion,” the draft position as presently worded appears to presume that Little LEO feeder links can share 1.4 GHz frequencies with other services on a non-interference basis. That issue is under consideration by the ITU’s study groups, and the U.S. should not prejudge the outcome of the study groups’ work. As the Commission stated in a related context, Little LEO feeder links should not be permitted in the 1427-1432 MHz band unless “[a]ll sharing studies ... [are] completed and show that satellite downlink sharing is feasible.”<sup>4</sup>

Second, the Commission should avoid undercutting decisions it has made over the last several years involving the 1427-1432 MHz band. In a series of orders beginning in 2000, the Commission: (1) upgraded the allocation for telemetry operations in the 1429.5-1432 MHz band from secondary to primary; (2) allocated the

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<sup>2</sup> Public Notice at 33.

<sup>3</sup> Public Notice at 33.

<sup>4</sup> Report and Order and Memorandum Opinion and Order, *Reallocation of the 216-220 MHz, 1390-1395 MHz, 1427-1429 MHz, 1429-1432 MHz, 1432-1435 MHz, 1670-1675 MHz, and 2385-2390 MHz Government Transfer Bands*, ET Docket No. 00-221, FCC 01-382 (Jan. 2, 2002) (“Allocation Order”) at 25 ¶ 55.

1427-1429.5 MHz band to the Wireless Medical Telemetry Service (“WMTS”) on a primary basis; (3) established seven geographic carve out areas in which, in order to accommodate pre-existing services, the primary allocation for WMTS is 1429-1431.5 MHz and the primary allocation for non-medical telemetry is 1427-1429 MHz and 1431.5/1432 MHz; (4) adopted service rules for medical and non-medical telemetry operations in the 1427-1432 MHz band; and (5) adopted coordination procedures for 1427-1432 MHz band users.<sup>5</sup> As a result of these actions, Itron has developed a new generation of automatic meter reading systems that it is marketing to electric, gas, and water utility companies.

Itron’s new systems include 1.4 GHz telemetry devices that are installed on individual meters, and Itron anticipates that millions of these devices will be deployed within a relatively short period. The devices, which have been specifically designed for licensed operations in the 1.4 GHz band, have to be small enough to fit into many different utility meters, must be low cost, and have limited system margin, making them vulnerable to interference from Little LEO feeder downlinks. This vulnerability is widespread, because Itron’s devices will be ubiquitous and Little LEO satellite systems have massive downlink footprints. Special care is warranted in these circumstances.

The Commission should endeavor to protect the integrity of its licensed 1427-1432 MHz band allocations. To the extent that sharing between Little LEO feeder links and other 1427-1432 MHz band users is deemed possible, therefore, the United States should support the approach taken in Document 8D/27-E (Nov. 17, 2003). That document, which was submitted by France and has been approved by the WG SE Ad Hoc group (the CEPT group responsible for the preparation of ITU-R WP 8B and 8D documents), establishes the need for 1430-1432 MHz Little LEO feeder link PFD levels

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<sup>5</sup> See Amendment of Parts 2 and 95 of the Commission's Rules to Create a Wireless Medical Telemetry Service, ET Docket 99-255, PR Docket 92-235, *Report and Order*, FCC 00-211, 15 FCC Rcd 11,206 (2000); *Allocation Order*; Report and Order, *Amendments to Parts 1, 2, 27 and 90 of the Commission's Rules to License Services in the 216-220 MHz, 1390-1395 MHz, 1427-1429 MHz, 1429-1432 MHz, 1432-1435 MHz, 1670-1675 MHz, and 2385-2390 MHz Government Transfer Bands*, FCC 02-152 (May 24, 2002). The Commission also made an allocation in the 1430-1432 MHz band for Little LEO feeder downlinks, but the allocation is conditional, subject to the outcome of the ITU-R study group process. See *Allocation Order* at ¶¶ 54-55.

that are below -164/-154 dBW/m<sup>2</sup>/4 kHz. That level is the minimum needed to protect fixed service stations against harmful interference.

### CONCLUSION

Accordingly, and for the reasons stated herein, the U.S. preliminary view concerning Agenda Item 1.17 should be revised to take into account the matters addressed in these comments.

Respectfully submitted,

ITRON, INC.

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July 2, 2004