



PUBLIC NOTICE

Federal Communications Commission
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DA 14-1488
October 14, 2014

**WIRELESS TELECOMMUNICATIONS BUREAU SEEKS COMMENT ON RECCO AB
REQUEST FOR WAIVER OF LOCATION AND MONITORING SERVICE RULES TO
PERMIT CERTIFICATION AND USE OF AN AVALANCHE RESCUE SYSTEM**

WT Docket No. 14-176

Comment Date: November 13, 2014
Reply Comment Date: November 28, 2014

On September 9, 2014, RECCO AB (RECCO) filed a petition for waiver of the Commission's Part 90 Location and Monitoring Service (LMS) rules to permit equipment authorization and licensing of RECCO's avalanche rescue system.¹ The RECCO system is a two-part technology consisting of a handheld detector and a passive reflector that is integrated into apparel, helmets, protection gear or boots. The detector transmits a signal on 902.85 MHz which is then re-radiated on 1805.7 MHz by the reflector worn by the avalanche victim. The signal from the reflector is received by the detector and enables search and rescue personnel to home in on the location of skiers, snowboarders, and others buried in avalanches.

A waiver is required because Section 90.953(h) of the Commission's Rules does not permit non-vehicular location services in the 902-904 MHz band.² The rule also imposes an antenna height limit of fifteen meters above ground, and the RECCO detector is intended for use from a helicopter in certain situations. In addition, RECCO requests a waiver of Section 90.953(i), which provides that non-multilateration LMS licenses will be issued to non-governmental entities only on a site-by-site basis.³

RECCO argues that its system will not cause interference to other communications because it has a twenty percent duty cycle (it repeatedly transmits for twenty milliseconds and is silent for eighty milliseconds) and uses a directional antenna with a beamwidth of approximately fifty degrees. RECCO also states that it is not likely that co-channel radio systems will be operating within or close to an avalanche rescue area. We seek comment on the waiver request.

¹ Petition for Waiver, filed by RECCO AB Sept. 9, 2014.

² See 47 C.F.R. § 90.953(h).

³ See 47 C.F.R. § 90.953(i).

Procedural Matters

Interested parties may file comments and reply comments in response to the applications and waiver requests on or before the dates listed on the first page of this *Public Notice*. All pleadings must reference WT Docket No. 14-176. Parties may file comments using (1) the Commission's Electronic Comment Filing System (ECFS), (2) the Federal Government's eRulemaking Portal, or (3) by filing paper copies.⁴

- Electronic Filers: File comments electronically using the Internet by accessing the ECFS: <http://www.fcc.gov/cgb/ecfs/> or the Federal eRulemaking Portal: <http://www.regulations.gov>. Filers should follow the instructions provided on the website for submitting comments.
- In completing the transmittal screen, filers should include their full name, U.S. Postal Service mailing address, and the applicable docket or rulemaking number. Parties may also submit an electronic comment by Internet e-mail. To get filing instructions, filers should send an e-mail to ecfs@fcc.gov, and include the following words in the body of the message, "get form." A sample form and directions will be sent in response.
- Paper Filers: Parties who choose to file by paper must file an original and two copies of each filing.

Send filings by hand or messenger delivery, by commercial overnight courier, or by first-class or overnight U.S. Postal Service mail. Address filings to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

- Deliver hand-delivered or messenger-delivered paper filings to FCC Headquarters at 445 12th St., SW, Room TW-A325, Washington, DC 20554 between 8:00 p.m. and 7:00 p.m. Use rubber bands or fasteners to hold deliveries together. Dispose of all envelopes before entering the building.
- Send commercial overnight mail (other than U.S. Postal Service Express Mail and Priority Mail) to 9300 East Hampton Drive, Capitol Heights, MD 20743.
- Send U.S. Postal Service first-class, Express, and Priority mail to 445 12th Street, SW, Washington DC 20554.

Parties are requested to send one copy of their comments and reply comments to Best Copy and Printing, Inc., Portals II, 445 12th Street, S.W., Room CY-B402, Washington, D.C. 20554, (800) 378-3160, e-mail FCC@BCPIWEB.com.

The requests, pleadings, and comments and reply comments filed in response to this *Public Notice* are available for viewing via the Commission's Electronic Comment Filing System (ECFS), <http://www.fcc.gov/cgb/ecfs>, by entering the docket number, WT 14-176. The documents also will be available for public inspection and copying during business hours in the FCC Reference Information Center, Portals II, 445 12th Street S.W., Room CY-A257, Washington, D.C. 20554. They may also be purchased from Best Copy and Printing, Inc., telephone (800) 378-3160, facsimile (202) 488-5563, TTY (202) 488-5562, e-mail FCC@BCPIWEB.com.

⁴ See Electronic Filing of Documents in Rulemaking Proceedings, *Report and Order*, GC Docket No. 97-113, 13 FCC Rcd 11322 (1998).

Alternate formats of this *Public Notice* (computer diskette, large print, audio recording, and Braille) are available to persons with disabilities by contacting the Consumer & Governmental Affairs Bureau at (202) 418-0530 (voice), (202) 418-0432 (TTY), or send an e-mail to fcc504@fcc.gov.

This proceeding has been designated as a “permit-but-disclose” proceeding in accordance with the Commission’s *ex parte* rules.⁵ Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made, and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenter’s written comments, memoranda or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with rule 1.1206(b). In proceedings governed by rule 1.49(f) or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (*e.g.*, .doc, .xml, .ppt, searchable .pdf). Participants in this proceeding should familiarize themselves with the Commission’s *ex parte* rules.

For further information, contact Mr. Tim Maguire of the Wireless Telecommunications Bureau, Mobility Division, at (202) 418-2155, Tim.Maguire@fcc.gov.

Action by the Deputy Chief, Mobility Division, Wireless Telecommunications Bureau.

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⁵ See 47 C.F.R. §§ 1.1200(a), 1.1206.