

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)
)
Applications for Public Safety Pool)
(Conventional) Licenses in the 433-445 MHz) File Nos. 0004270113 *et al.*
Band for Mobile Use of ReconRobotics Video)
and Audio Surveillance Systems and)
Associated Waiver Requests)

Opposition to Petitions to Deny

Pursuant to Section 1.939(f) of the Commission's Rules, ReconRobotics, Inc. opposes the Petitions to Deny filed on August 4, 2010, by ARRL, the national association for Amateur Radio,¹ and on August 6, 2010, and other dates, by James Edwin Whedbee.²

Both Petitions are frivolous. They appear to have been filed solely to cause delay.

ARRL's objections are not to the license applications, but to an underlying equipment waiver. ARRL consistently opposed the waiver. Having failed in the waiver proceeding, it now tries again by raising the same arguments in the licensing process. But the arguments against the waiver do not apply here. The only effect of ARRL's Petition can be to inconvenience ReconRobotics and its public safety customers by slowing the latter's licenses.

Mr. Whedbee's objections likewise do not challenge the license applications, but raises issues that the waiver has already resolved.

¹ Petition to Deny Applications of ARRL, the national association for Amateur Radio, File Nos. 0004331029 *et al.* (filed Aug. 4, 2010) (ARRL Petition to Deny). ARRL filed 69 Petitions. See the attached "Affected File Numbers."

² Petition to Deny Application(s) for License of James Edwin Whedbee, File Nos. 000430133 *et al.* (filed Aug. 6, 2010) (Whedbee Petition to Deny). Mr. Whedbee filed the same petition several times with differing lead file numbers, for a total of 84. See the attached "Affected File Numbers." We treat Mr. Whedbee's various pleadings as one.

The Commission should summarily dismiss both Petitions as groundless, and issue the licenses without delay.

A. BACKGROUND

ReconRobotics manufactures the Recon Scout®, a small, remote-controlled, maneuverable surveillance robot that provides the operator with video and audio, along with other needed data. Users are limited to state and local law enforcement and firefighting agencies, and infrastructure security personnel in areas that may be too hazardous for human entry.³



On January 11, 2008, ReconRobotics requested a waiver to operate the device at 430-448 MHz. ReconRobotics explained, and subsequently documented, that the device cannot achieve adequate building penetration at higher frequencies.⁴ Because the Recon Scout can be remotely driven deep into a structure, or down a stairwell into a basement, the signal may have to pass through multiple walls to reach the operator. Higher frequencies do not propagate as well through building materials as lower frequencies do.

³ The unit is small enough, and strong enough, to be dropped, launched, or thrown to where it is needed. Typical applications include checking a building prior to forced entry, locating hostages, hostiles, officers, and bystanders before a rescue attempt, searching for survivors in a burning building, and inspecting the site of a chemical or nuclear release. For more information, *see* Request for Waiver of ReconRobotics, Inc. in WP Docket 08-63 (filed Jan. 11, 2008).

⁴ ANDREW DRENNER ET AL., EMPIRICAL STUDY OF THE EFFECTS OF 434 MHZ VS. 915 MHZ FREQUENCY BAND ON THE PERFORMANCE OF THE RECON SCOUT, filed with Letter from Mitchell Lazarus to Marlene H. Dortch, Secretary, FCC in WP Docket No. 08-63 (filed Nov. 3, 2008).

ARRL, whose members have secondary rights in the 420-450 MHz band, opposed the waiver on multiple grounds. Several individual amateur operators also opposed. More than 35 first responders filed in support of the waiver.

On February 23, 2010, the Commission, having considered and rejected each of the grounds for opposition, granted the waiver,⁵ and subsequently certified the Recon Scout under FCC ID UYXRSK2010-01.

ARRL filed a Petition for Reconsideration against the waiver that largely repeated the same arguments the Commission had already found wanting.⁶ A footnote in its pleading requested a stay of the waiver.⁷ ReconRobotics opposed the reconsideration and the stay.⁸ The reconsideration is presently pending. The Commission has not acted on the request for a stay.

The challenged applications use equipment authorized under the waiver.

B. STANDING

The Commission's Rules permit a Petition to Deny only from a "party in interest."⁹ Neither Petitioner has shown that he or it operates in any of the geographic areas specified in the challenged applications, on any of the relevant frequencies, in such a way as to be affected by a grant of the licenses. Petitioners thus have not established the requisite standing.

⁵ *ReconRobotics, Inc., Request for Waiver of Part 90 of the Commission's Rules*, Order, 25 FCC Rcd 1782 (2010) (*Waiver Order*).

⁶ Petition for Reconsideration of ARRL, The National Association for Amateur Radio in WP Docket No. 08-63 (filed March 24, 2010). Two individual amateur licensees also sought reconsideration.

⁷ *Id.* at 1 n.1.

⁸ Opposition of ReconRobotics, Inc. to the Petition for Reconsideration of ARRL in WP Docket No. 08-63 (filed April 6, 2010).

⁹ 47 C.F.R. § 1.939(a).

An Opposition to a Petition to Deny is permitted from the applicant or “any other interested party.”¹⁰ Here, where the petitions in fact challenge not the applications but ReconRobotics’s equipment waiver and certification, there can be no question that ReconRobotics is an interested party.

C. THE WAIVER IS IN FORCE.

ARRL cites its request for stay, and says: “This request has not yet been adjudicated. Accordingly, action on the subject applications is premature.”¹¹

That is nonsense. The waiver, once granted, is effective unless the Commission says it is not. ARRL cannot create a stay merely asking for one.¹²

D. OBJECTIONS TO THE WAIVER HAVE NO PLACE IN A PETITION TO DENY.

The large bulk of ARRL’s Petition to Deny does nothing more than restate its objections to the waiver. ARRL alleged in the waiver proceeding that the Recon Scout would cause harmful interference to amateur radio operations, and vice versa, and it raised frequency allocation issues.¹³ The Commission considered these arguments, disagreed, and granted the waiver.¹⁴ ARRL repeated the same arguments in its Petition for Reconsideration, along with labeling issues and a charge of unlawful marketing. It now word-processes its past arguments into a Petition to Deny.

¹⁰ 47 C.F.R. § 1.939(f).

¹¹ Petition for Reconsideration of ARRL at 2.

¹² ARRL did not even try to meet two of the basic requirements for a stay: a separate pleading to request the stay, 47 C.F.R. § 1.44(e), and a showing on each of four specified issues. *Paging Systems, Inc.*, 20 FCC Rcd 8087 at ¶ 15 (2005). In order to grant a stay on the present record, the Commission would have to remake long-standing law.

¹³ *See generally* ARRL pleadings in WT Docket No. 08-63.

¹⁴ *Waiver Order* at ¶¶ 8-10.

Challenges to the *Waiver Order* belong in WT Docket No. 08-63, not here. Arguments against the waiver are not a ground for denial of the licenses.

ReconRobotics responded to ARRL's waiver issues in the appropriate docket,¹⁵ and will not repeat the response here. We do, however, address ARRL's remaining points.

E. THE WAIVER, THE CERTIFICATION, AND THE LICENSE APPLICATIONS ARE ALL CONSISTENT.

ARRL claims to have found two discrepancies that, it says, invalidate the certification of the Recon Scout, and hence the license applications. Neither discrepancy exists.

First, ARRL notes that the *Waiver Order* authorizes bandwidths of 6 MHz, while the certification shows an emissions designator of 100KC3F, corresponding to a bandwidth of 100 kHz.¹⁶ ARRL goes on to argue that either the certified device is not authorized by the waiver, or the certification grant is in error.¹⁷ Neither is true.

The 6 MHz in the *Waiver Order* is the nominal bandwidth of a video NTSC (analog) transmitter, the kind used in the Recon Scout. As used in the waiver, as a practical matter, it represents the maximum bandwidth permitted. Nothing in the *Waiver Order* requires a transmitter to use the full 6 MHz. The 100 kHz bandwidth on the certification grant is the actual value, as measured according to Commission procedures. Being less than 6 MHz, it is fully consistent with the waiver.

¹⁵ Opposition of ReconRobotics, Inc. to the Petition for Reconsideration of ARRL in WP Docket No. 08-63 (filed April 6, 2010).

¹⁶ ARRL Petition to Deny at 3 n.4.

¹⁷ *Id.*

ARRL further objects that the *Waiver Order* specifies three 6 MHz frequency bands, at 436-442 MHz, 442-448 MHz, and 430-436 MHz,¹⁸ while the equipment authorization and the license applications both specify 433-445 MHz.¹⁹ But these are consistent. The TCB that issued the grant followed the Part 15 practice: “List the center frequency of the lowest channel to the center frequency of the highest channel.”²⁰ The range in the equipment authorization does just that.²¹

F. MR. WHEDBEE’S OBJECTIONS ARE RESOLVED BY THE WAIVER.

Mr. Whedbee’s Petition to Deny restates ARRL’s interference concerns and allocation issues.²² These issues were resolved in the waiver proceeding, as to which ARRL and others have sought reconsideration. Mr. Whedbee could have raised his concerns in the waiver proceeding, but did not participate. The issues have no place here.

Mr. Whedbee next objects that the organization handling the license applications did not coordinate frequency usage with him.²³ There is no requirement in the Commission’s Rules for

¹⁸ *Waiver Order* at ¶ 11. The first unit sold to an entity must operate at 436-442 MHz, the second unit at 442-448 MHz, and the third unit at 430-436 MHz. The sequence is intended to minimize any risk of interference to amateur radio operators. *Id.* at ¶ 9.

¹⁹ ARRL Petition to Deny at 5 n.8, 6.

²⁰ *Frequency Range Listings for Certification Grants*, <https://fjallfoss.fcc.gov/kdb/GetAttachment.html?id=23557> at ¶ 3.

²¹ The TCB likely adopted the Part 15 procedure because the corresponding provision for licensed transmitters is inapplicable to the Recon Scout: it requires the bandwidth in the certification to overlap that in the rules. *Id.* at ¶ a. The waiver allows the Recon Scout to use frequencies different from those in the rules.

²² Whedbee Petition to Deny at 1-3.

²³ *Id.* at 2.

frequency coordination with amateur radio operators; and the *Waiver Order* plainly states: “Part 90 frequency coordination is not required.”²⁴

Finally, in a separate document, Mr. Whedbee restates the interference, allocation, and coordination issues, and adds that the waiver permits only the sale of the equipment, not its licensing.²⁵ The *Waiver Order* says otherwise: “[W]e grant ReconRobotics a waiver to permit equipment authorization *and customer licensing under Part 90* for the Recon Scout”²⁶

CONCLUSION

All of the issues in both Petitions to Deny, except for the alleged technical discrepancies, are fully addressed in the *Waiver Order*. Petitioners’ pursuit of those issues here amounts to a further request for reconsideration of the waiver. Such a request is both out of time and in the wrong forum. The alleged technical discrepancies reflect only ARRL’s misunderstanding of Commission practices, not any defect in the certification.

ARRL has sought at every stage to impede the sale and use of the Recon Scout. Filing a Petition to Deny so completely lacking in substance can only be a further effort to delay the grant of the licenses, and hence to create needless difficulties for ReconRobotics and the public safety agencies it serves.

²⁴ *Waiver Order* at ¶ 13 (citation footnote omitted).

²⁵ This document is a memorandum from Mr. Whedbee to the Chief of the Wireless Telecommunications Bureau. Mr. Whedbee describes its contents as an “ex parte suggestion,” and states his intent to file it as an “Erratum” pleading on each license application.

²⁶ *Waiver Order* at ¶ 15 (emphasis added).

We ask the Commission to swiftly dismiss the Petitions and grant the requested licenses.

Respectfully submitted,

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August 16, 2010

AFFECTED FILE NUMBERS

0004270113	0004332028
0004323710	0004332058
0004323903	0004333278
0004323989	0004333302
0004323990	0004333316
0004327769	0004333336
0004327793	0004333353
0004327816	0004333409
0004327954	0004333431
0004329762	0004333448
0004329770	0004333550
0004329788	0004333561
0004329833	0004333571
0004330231	0004333579
0004330276	0004334593
0004330295	0004334597
0004330345	0004336311
0004330375	0004336333
0004330395	0004336348
0004330433	0004336417
0004330452	0004336448
0004330803	0004337230
0004330938	0004337276
0004330952	0004341313
0004330988	0004341325
0004331004	0004341350
0004331029	0004344532 *
0004331064	0004344564 *
0004331678	0004345093 *
0004331681	0004345125 *
0004331692	0004345139 *
0004331714	0004345171 *
0004331737	0004346580
0004331812	0004346605 *
0004331906	0004346626 *
0004331911	0004346678 *
0004331920	0004346697 *
0004331979	0004348020 *
0004331982	0004348657 *
0004331984	0004349756 *
0004331991	0004349765 *
0004331994	0004351768 *

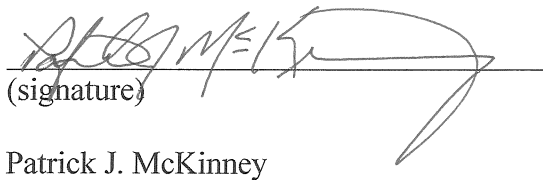
* Responds only to the Petition to Deny of Mr. James Edwin Whedbee.

DECLARATION OF PATRICK J. McKINNEY

1. My name is Patrick J. McKinney. The address at my place of business is 7620 W. 78th Street, Edina, MN 55439.
2. I am Chief Operating Officer of ReconRobotics, Inc.
3. I have read the foregoing Opposition to Petitions to Deny.
4. The factual representations stated in the foregoing Opposition to Petitions to Deny are accurate to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 11 th day of August, 2010.


(signature)

Patrick J. McKinney

CERTIFICATE OF SERVICE

I, Emily Borkholder, a secretary with the firm of Fletcher, Heald & Hildreth, PLC, hereby state that true copies of the foregoing OPPOSITION TO PETITIONS TO DENY were sent this 16th day of August, 2010, by first class mail, postage prepaid to the following, except those listed at the FCC, which are hand delivered:



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SAN BERNARDINO, CA 92415

MIKE LOBERG
LARIMER COUNTY SHERIFF'S OFFICE
2501 MIDPOINT DRIVE
FORT COLLINS, CO 80525

APCO INTERNATIONAL INC. LICENSING
SERVICE
CHRISTINE PHELPS
351 N. WILLIAMSON BLVD
DAYTONA BEACH, FL 32114