

**Sensormatic**

**Electronics Corporation**  
**Deerfield Beach, FL 33442**

**Response to FCC Part 15 Changes:  
Petition for Reconsideration  
and Implementation Delay**

**May 9, 1989**

# Who Is Sensormatic?

- Worldwide leader in retail theft protection ... 70% of market
- Microwave, video, and magnetic technologies
- Major factor in point-of-sale terminal market
- Retail systems installed in major chains ... Macy's, Sears, Bloomingdales, Lord & Taylor
- Emerging factor in industrial security ... access control, CCTV, burglar intrusion
- \$ 140+ million in FY '89 revenues

**Systems Deter Shoplifting ... a \$30 B Consumer Cost**



## **Problem: FCC action allows widespread use of new wireless devices at 902-928 MHz**

- **Part 15 Report & Order threatens core business**
- **Over 30,000 microwave systems in U.S.... expect  
severe interference and malfunction**
- **400 million tags installed on merchandise**
- **Twenty years of successful operation**
- **902-928 MHz essential for wide Mall entrances**
- **Expect high density of wireless devices in Malls  
... the new town square**

**Range of Interference ... 1,000 to 2,000 Ft**

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1989  
P802.4L*

# **The Wireless Avalanche**

- **Wireless computer networks**
- **Wireless point-of-sale terminals**
- **Wireless security ... TV, sensors, access control**
- **Wireless telephones, microphones**
- **Wireless VCR to TV links**
- **Wireless control**
- **Wireless toys, gadgets ...**

**Concentrated in Malls ... Our Home**



# **But We Have A Unique Perspective**

- We see many opportunities to market wireless devices in our security and POS markets
  - Closed Circuit TV
  - Access control
  - Remote intrusion alarms
  - Point-of-sale terminals
- Threatens our core business ... microwave anti-theft systems

**Can We Find a Way to Coexist?**

# FCC Overlooked Our Concerns

- Current Part 15 rules limit power and types of equipment in 902-928 MHz ... over 20 years
- Sensormatic successfully operates in this FCC-created environment ... large installed base
- Now FCC wants to change this from an ISM band to what is now called a "Consumer" band
- Consumer band permits x100 power and a myriad of wireless devices ... total chaos!
- Historically, FCC considered needs of the installed base in rulemaking

**Can We Find a Way to Coexist?**



# Sensormatic Proposes

- Establish wireless consumer band at 1215 to 1300 MHz ... now allocated to amateur radio ... or
- Use 905-928 MHz for the consumer band and spread spectrum, and ...
- Continue use of 902-905 MHz for Field Disturbance Sensors (anti-theft systems) and ISM
  - Only 12% of original allocation
  - Recognizes rights of installed base

**A Way to Coexist**

## **In Conclusion ...**

- Sensormatic is filing a Petition for Reconsideration to the FCC ... however
- To file a comprehensive petition, we need <sup>26</sup> additional time beyond the May ~~18~~<sup>26</sup>th deadline
- We ask that you set aside the June 23, 1989 implementation date of the Report and Order