ORIGINAL

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of	)	
	)	
UltraVision Security Systems, Inc.,	)	File No. 0105-EX-PL-2006
Experimental License WD2XYH	)	

TO: Experimental Licensing Branch
Office of Engineering and Technology

**Opposition of UltraVision Security Systems, Inc.
to "Petition to Rescind or Modify Experimental License"
of Association for Maximum Service Television, Inc.**

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March 14, 2007

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On February 27, 2007, the Association for Maximum Service Television, Inc. (MSTV) filed a "Petition to Rescind or Modify Experimental License" (Petition) against License WD2XYH held by UltraVision Security Systems, Inc.

UltraVision opposes.

A. MSTV Has Not Alleged or Established that UltraVision Causes Interference.

MSTV seeks rescission or modification of UltraVision's license on interference grounds.[1] But MSTV has *not* alleged that UltraVision's operations under the license have actually caused interference. Rather, MSTV seeks preemptive action on nothing more than its own speculation that UltraVision might cause interference in the future.[2]

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[1] MSTV Petition at 2-3.

[2] Noting also that UltraVision has a waiver request pending for its device, MSTV sets out the odd claim that that rescission of the license would prevent UltraVision from making "an end run on its waiver request." MSTV Petition at 4-5. UltraVision needs the waiver in order to certify and market its product. The license permits only experimental operation at UltraVision's own facility. It is not a substitute for the waiver in any respect.

MSTV points to an informal demonstration in which UltraVision signals disrupted TV reception in the same room, an estimated 25 feet away.[3] No measurements were taken of distance, of incoming TV signal strength, or of anything else. The demonstration proves only what it actually showed -- that interference is possible at a few meters. It provides no basis for reasoned predictions about interference under other conditions.[4]

UltraVision complies with Part 15 emissions limits over its operating range of 216-700 MHz, and has no significant emissions elsewhere. MSTV cites a technical study in the "TV white space" docket that, according to MSTV, shows Part 15 levels are inadequate to protect TV reception.[5] Elsewhere, MSTV interprets this same study as proving interference to digital TV feet from a Part 15 compliant device at a distance of 78 feet, and to analog TV at 452 feet.[6] That study did not use an UltraVision emitter, however, but a far more interfering device. As a result, projections from that study greatly overestimate UltraVision's interference potential.[7]

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[3] MSTV Petition at 3. *See also* Comments of MSTV in ET Docket No. 06-195 Appendix at 1 (filed Feb. 20, 2007) ("MSTV Waiver Comments") (alleging observed interference at "about 25 feet").

[4] For details, *see* UltraVision's Reply to Comments of MSTV in ET Docket No. 06-195 at 8-9 and attached "Declaration of Dennis J. Johnson" (filed March 8, 2007) ("UltraVision Waiver Reply").

[5] MSTV Petition at 3 n.7, *citing* Joint Comments of MSTV and NAB in ET Docket No. 04-186 at 21-24 (filed Jan. 31, 2007).

[6] MSTV Waiver Comments at 6.

[7] *Details*: The Commission's compliance procedures specify quasi-peak measurements below 960 MHz. The white space study, consistent with its purpose, used a COFDM emitter intended to emulate a broadband wireless device. Its average emissions are only a little below the quasi-peak. UltraSensor, in contrast, emits sparse pulses having an extremely low duty cycle of –38 to –44 dB. This puts its average emissions hundreds or thousands of times lower than the quasi-peak. A compliant COFDM emitter thus has far higher average emissions,

B. There is No Need to Notify TV Stations of a 7 Nanowatt Emitter.

As an alternative to cancelling UltraVision's experimental license, MSTV asks the Commission to require that UltraVision give 30 days' advance notice to all TV stations operating on channels 14 through 52, and having Grade B contours over the experimental site, of the dates, times, locations, frequencies, and powers of operation.[8] This is necessary, says MSTV, so that stations can address interference reported by viewers.

TV viewers will not receive interference from UltraVision. Its authorized power level is only 7 nW ERP -- 7 *billionths* of a watt. MSTV seems to think this minuscule signal will blanket New England with interference. To the contrary, it is so weak as to be undetectable at a few tens of meters. The notification regime requested by MSTV is an unnecessary solution to a problem that does not exist.

C. UltraVision Will Not Operate Close Enough to Any Residence to Cause Interference.

UltraVision's license specifies a latitude and longitude, but no radius. This confines operation to the nearest second of arc specified by the coordinates. That area measures approximately 75 by 100 feet.

As noted above, MSTV claims that UltraVision can cause interference to digital TV out to 78 feet, and to analog TV to 452 feet.

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and transmits far more energy, than a compliant UltraVision unit. In other words, application of the white-space data exaggerates the threat of interference from UltraVision many times over. For more information, *see* UltraVision Waiver Reply at 9-10.

[8] MSTV Petition at 5-6.

Although we think these numbers are much too large, it happens there is no residence located within 452 feet of UltraVision's authorized rectangle of operation. According to MSTV's own figures, then, UltraVision presents no risk of interference.

Going forward, UltraVision will voluntarily refrain from operating within 140 meters (452 feet) of a residence through February 18, 2009, or within 24 meters (78 feet) of a residence after that date, when analog TV transmission will cease.

CONCLUSION

The Commission should summarily deny MSTV's Petition as having failed to justify its request. UltraVision will nonetheless adhere to conditions that, according to MSTV's own figures, fully resolve its concerns.

Respectfully submitted,

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March 14, 2007

TECHNICAL CERTIFICATION

I am a technically qualified person who reviewed the foregoing Opposition of UltraVision Security Systems, Inc. to "Petition to Rescind or Modify Experimental License" of Association for Maximum Service Television, Inc.

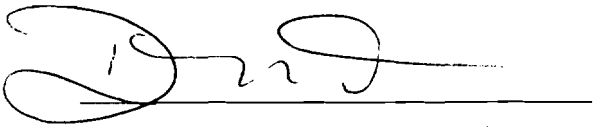
I certify that the technical statements therein are correct to the best of my knowledge.

Dennis J. Johnson
President
UltraVision Security Systems, Inc.

3/12/07

CERTIFICATE OF SERVICE

I, Deborah N. Lunt, a secretary with the law firm of Fletcher, Heald & Hildreth, PLC, hereby state that true copies of the foregoing OPPOSITION OF ULTRAVISION SECURITY SYSTEMS, INC. TO "PETITION TO RESCIND OR MODIFY EXPERIMENTAL LICENSE" OF ASSOCIATION FOR MAXIMUM SERVICE TELEVISION, INC. have been served this 14th day of March, 2007, by first class mail, postage prepaid, to the following listed on the attached Service List, except that persons having addresses listed at the Federal Communications Commission were served by hand and/or by email.



Deborah N. Lunt

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