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Date 28 April 2010

Subject: Response on the Request for comments on "Allocations of Spectrum for Technologies such as DECT, to meet the Residential and Enterprise Intra-Telecommunication Requirements"

Gigaset Communications fully supports the proposal document concerning the allocations of spectrum for technologies such as DECT, to meet the residential and enterprise intratelecommunication requirements. The document demonstrates clearly the benefits for the users as well as the technical advantages of DECT in case DECT Technology is introduced.

Gigaset Communications GmbH is one of the world's largest manufacturers of cordless phones and the clear market leader in Europe for DECT phones. With its headquarters in Munich, the company develops, manufactures and distributes high-quality products under the brand Siemens Gigaset. Its portfolio includes fixed-network phones, Voice over IP devices and software solutions.

Gigaset Communications, previously a telephone business of Siemens mobile, has had a strong influence on the development of cordless telephony since the beginning of the 1990s. Gigaset Communications has a presence around the world, with 1,700 employees working in some 70 countries. It manufactures most of the Gigaset products at its production facility in Bocholt, Germany, under the most stringent quality and environmental standards.

Below, we highlight our comments for the DECT Technology

DECT: Digital Enhanced Cordless Technology

DECT is an ETSI standard, originally Digital European Cordless Technology. It has been initiated in the 90's, and is now spreading all over the world, like GSM has done.

Interference-free

DECT operates within a protected spectrum (1880-1900 MHz in Europe and 1910 – 1920 MHz in other countries as mentioned in the below list). It operates a dynamic channel selection to select the best available channels. It does not interfere with the 2.4 GHz ISM band (WiFi friendly)

Gigaset Communications FZ LLC, Dubai Internet City, Bldg No 6, P.O. Box: 502833, Dubai, UAE

Incorporated as a Free Zone Company with Limited Liability pursuant to the Dubai Technology and Media Free Zone Private Companies Regulations 2003 issued under Law No. 1 of 2000 of the Emirate of Dubai (as amended) تأسست كشركة منطقة حرة ذات مسؤولية محدودة وفقا لقانون الشركات الخاصة في منطقة دبي الحرة للتكنولوجيا والإعلام 2003 والصادر بموجب قانون رقم (وتعديلاته)



High efficiency of spectrum use

DECT continuously monitors channel usage, and automatically selects the right ones. It can manage without any frequency planning a full array of bases every 10 meters. No risk of interference, even if all neighbors are using DECT also

Security

DECT authentication: for registering a handset, the user puts the base in registration mode, and enters a unique PIN-code on the handset. Most handsets are sold as pre-registered packs

DECT encryption: All communications between base and handset are encrypted with a set of keys which are renewed for each call

Long range without interference

The DECT range is at least 300 m in free space, and reaches easily 50m with an in-door base: You can usually phone from your garden

Low power consumption

The DECT technology is simple and efficient. Bases use typically less than 3W of operating power, and handsets operate with two AAA rechargeable batteries

Outstanding Stand-by and Talk times

Typical Talk time is 12 hours, and standby time is typically around one week

Interoperability between all brands

The GAP profile allows handset and bases from different suppliers to interwork for basic functions: register, make a call, break a call

Low cost

Given its wide customer base, DECT and its corollaries DECT 6.0 are extremely cost effective, much better and less expensive than corresponding voice technologies like 2.4 GHz and 5.8 GHz and PHS Typical full system price varies from 25€ to 150€

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List of countries with existing type approval of Gigaset DECT - products

Countries	DECT approved?
APAC	
Indonesia	YES / 1880 - 1900 MHz
Vietnam	YES / 1880 - 1900 MHz
Korea (South)	YES / 1786 - 1803 MHz
Philipines	YES / 1880 - 1910 MHz
Australia	YES / 1880 - 1900 MHz
Hong-Kong	YES / 1880 - 1900 MHz
India	YES / 1880 - 1900 MHz(licensed WLL)
Malaysia	YES / 1880 - 1900 MHz
New Zealand	YES / 1880 - 1900 MHz
Singapore	YES / 1880 - 1900 MHz
Taiwan	YES / 1880 - 1895 MHz
America	
Argentina	YES / 1910 - 1930 MHz
Brazil	YES / 1910 - 1920 MHz
Canada	DECT 6.0 / 1920-1930 MHz
Chile	YES / 1910 - 1930 MHz (22dBm)
	YES / 1880 - 1900 MHz
Mexico	and 1910 - 1930 MHz
USA	DECT 6.0 / 1920-1930 MHz
Europe	
Austria, Belgium, Bulgaria,	
Cyprus, Czech Republic,	
Denmark, Estonia, Finland,	
France, Germany, Greece,	
Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta,	
Netherlands, Poland, Portugal,	
Romania, Slovakia, Slovenia,	
Spain, Sweden, United Kingdom,	
Iceland, Liechtenstein, Norway,	
Switzerland	YES / 1880 - 1900 MHz
Croatia	YES / 1880 - 1900 MHz
Serbia	YES / 1880 - 1900 MHz
Belarus	YES / 1880 - 1900 MHz
Russia	YES / 1880 - 1900 MHz
Montenegro	YES / 1880 - 1900 MHz
Bosnia and Herzegowina	YES / 1880 - 1900 MHz
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Gigaset

Middle Foot act	
Middle East Africa	
Morocco	Voc / 1990 1995 5 MI
Tunisia	Yes / 1880 - 1885,5 MHz
Egypt	Yes / 1880 - 1900 MHz
Israel	YES / 1880 - 1900 MHz
	YES / 1880 - 1900 MHz
South Africa	YES / 1880 - 1900 MHz
United Arab Emirates	
Saudi Arabia	YES / 1880 - 1900 MHz
Mauritius	YES / 1880 - 1900 MHz
	YES / 1880 - 1900 MHz
Jordan	YES / 1880 - 1900 MHz

Best Regards

Shahzad Ahmed

Chief Executive Officer

