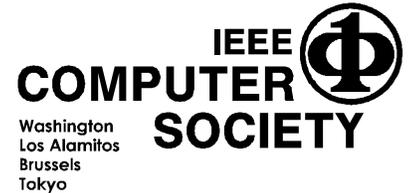


Standards Working Group IEEE 802

Local and Metropolitan Area Network Standards
Committee
Homepage at <http://grouper.ieee.org/groups/802/>



Reply to: Vic Hayes, Chair, IEEE P802.11
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July 19, 1999

Magalie R. Salas, Esquire
Secretary
Federal Communications Commission
445 12th St. SW
Washington DC 20554

Re: ET Docket No. 98-42 --- Ex Parte Communication

Dear Ms. Salas:

IEEE 802, the LAN/MAN Standards Committee (“the Committee”), is writing in regard to ET Docket No. 98-42: 1998 Biennial Regulatory Review, Amendment of Part 18 of the Commission’s Rules to Update Regulations for RF Lighting Devices. The Committee has already submitted comments in the Commission’s Notice of Proposed Rulemaking (“the Notice”), FCC 98-42 on several previous occasions. The Committee respectfully submits this further statement in the matter specifically regarding the comments from Fusion Lighting in their letter of May 28th, 1999, and to the subsequently revised proposal for a limit on in-band emissions for RF lighting devices as proposed by the Part 15/Mobile Satellite Services (MSS) Interests.



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Based on that review, we offer the following comments:

- a. We support expansion of region of peak emissions from 5 MHz to 20 MHz. We further support the location of this band in the 2460 to 2480 MHz region, as this will minimize adverse impact on existing FHSS and DSSS Part 15 systems, and promote joint use of the 2.45 GHz ISM band by both RF lighting devices and Part 15/MSS communications equipment.
- b. We are of the opinion that the limit for emissions in the 2400 - 2460 MHz and 2480 - 2500 MHz bands should remain at 1mV/m @ 3m as previously stated in the second proposal. The measurement method described in the March 15, 1999 letter from Mr. Ray LaForge to Mr. Michael Ury indicates a video bandwidth setting of 10 Hz. For magnetrons displaying the type of spectral splatter described above, a limit of 10 mV/m is not sufficiently low to preclude the use of half-wave or full-wave rectified power supplies that have inadequate ripple suppression to prevent significant and harmful frequency transients of the magnetrons.

Based on these considerations, we recommend the current Part 15/MSS proposed limitation on in-band emissions be revised as follows:

Region I (2400 - 2460 MHz): Emissions shall be limited to 1 mV/m @ 3 m(avg)

Region II (2460 - 2480 MHz): Emissions shall be limited to 330 mV/m @ 3m (avg)

Region III (2480 - 2500 MHz): Emissions shall be limited to 1 mV/m @ 3 m (avg)

We thank you for your continued attention in this matter. We remain hopeful that a solution that is mutually agreeable to all parties in this matter can be reached.

Respectfully,

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