Standards Working Group IEEE 802

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

IEEE COMPUTER SOCIETY
Washington
Los Alamitos
Brussels
Tokyo

Reply to: Vic Hayes, Chair, IEEE P802.11
Lucent Technologies Nederland B.V.
Zadelstede 1-10
3431 JZ Nieuwegein, the Netherlands
phone: +31 30 609 7528
fax: +31 30 609 7556
e-mail: v.hayes@ieee.org

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.

Headquarters Office
1730 Massachusetts Avenue, N.W.
Washington, D.C. 20036-1903
(202) 371 0101
TWX: 7108250437 IEEE Compso
FAX: (202) 728 9614

Publications Office
10662 Los Vaqueros Circle
Los Alamitos, CA 90720
Phone:(714) 821 8380
TWX: 7108250437 IEEE Compso
FAX: (714) 821 4010

European Office
13 Avenue de l'Aquilon (rez A)
1200-Brussels, Belguim
Phone: +32 2 770 21 98
TWX: 25387 AVVALB
FAX: +32 3 660 30 14

Asian Office
Ooshima Building
2-19-1 Minami Aoyama
Minato-ku
Tokyo 107 Japan
Phone: +81 3 408 3118
FAX: +81 3 408 3553

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,

James T. Carlo (jcarlo@ti.com)
Chair, IEEE 802 LAN/MAN Standards
Texas Instruments
9208 Heatherdale Drive
Dallas TX 75234

Vic Hayes (vichayes@lucent.com)
Chair, IEEE 802.11, Wireless LANs
Lucent Technologies Nederland B.V.
Zadelstede 1-10
3431 JZ Nieuwegein, the Netherlands

Cc:

Chairman William E. Kennard
Commissioner Susan Ness
Commissioner Harold Furchgott-Roth
Commissioner Michael K. Powell
Commissioner Gloria Trastani
Dale Hatfield
Julius P. Knapp
Karen Rackley
John A. Reed
Anthony Serafini

Deborah Rudolph, IEEE, USA
Dr. Ned Sauthoff, IEEE, USA