
**IEEE P802.11
Wireless LANs**

**Proposal for a third letter for filing in the proceedings of FCC
OET Docket No. 99-231**

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Summary

Attached is a proposal for a third letter for filing in the proceedings of the FCC in NPRM, OET Docket 99-231. This letter provides material to state the group's position on the Direct sequence part of the NPRM.

The text has been made by the experts mentioned above, based on submissions and discussions held in meetings of the ad-hoc regulatory group on Monday September 13, 1999.

The intention is to discuss the text on the Wednesday, September 15, 1999 meetings of the ad-hoc regulatory group with the aim to recommend to conduct an 802.11 and 802.0 combined e-mail ballot.

Sept 13, 1999

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

Re: ET Docket No. 99-231

Dear Ms. Salas:

IEEE 802, the LAN/MAN Standards Committee (“the Committee”), is writing in regard to ET Docket No. 99-231: Amendment of Part 15 of the Commission’s Rules for Spread Spectrum Devices. On August 19, 1999, the Committee submitted comments in this proceeding expressing opposition to the proposed rules changes which would allow wider channels for FHSS systems as described in the Notice of Proposed Rule Making (the “Notice”) in this proceeding.

Committee supports the CW jammer test, together with the additional requirement for mathematical justification for systems utilizing codes with less than 10 chips as proposed in paragraph 15 of the NPRM and advises to refrain from adding an alternative Gaussian noise test as proposed in paragraph 14.

The Institute of Electrical and Electronics Engineers, Inc. (IEEE) is a USA-based international professional organization with more than 325,000 members representing a broad segment of the computer and communications industries. IEEE 802.11, a chartered Working Group under the Committee, has developed a standard for Wireless Local Area Networking (WLAN) in the 2400-2483.5 MHz band (“the 2450 MHz band”). The number of individuals and corresponding company sponsorships in the IEEE 802.11 Working Group evidences the strong interest in wireless local area networking. The Working Group currently has over 200 members employed by 86 companies

The Commission has asked for comments concerning the testing methods proposed in the NPRM to qualify the processing gain requirement of Direct Sequence Spread Spectrum Systems.

The Committee has performed extensive analysis and technical trade-off studies to ensure that its 2.4 GHz high data rate waveform adheres to the processing Gain requirement of at least 10dB. As a result of these studies, it has concluded that the processing Gain test using the CW jamming test as proposed in paragraph 15 of the NPRM is a valid method to confirm the processing gain requirement.

The CW jamming margin test was introduced as a “technology neutral” means of assessing the effective performance of spread spectrum systems. This test has performed its intended function very well. Today systems delivering data rates of 11 Mbit/s are on the market. These systems are backed by a technical standard developed under the auspices of the IEEE. IEEE 802.11 High Rate systems operate in the same spectrum envelope as their 1 and 2 Mbit/s precursors and can be successfully and reliably tested with the CW jamming margin test. The CW jammer test, together with the additional requirement for mathematical justification for systems utilizing codes with less than 10 chips, is a sufficient method to confirm the processing gain requirement. After considering alternate tests, including the proposed Gaussian Noise approach as proposed in paragraph 14 of the NPRM, the Committee has concluded that the CW test is the most sound technically means of verifying compliance with the processing gain requirement.

While evaluating a Gaussian jamming signal testing method the Committee found that it requires a complex definition and measurement process so it does not become prone to errors.

In specific, the characteristics of the Gaussian signal, including the filters used in generating and measuring it, must be clearly defined. In addition, measurement equipment must be properly set up and calibrated to give the correct results. Implementation loss of the system under test plays a more prominent role in a Gaussian jamming margin test than it does with a CW jamming margin test and must be carefully defined.

We strongly support maintaining the well defined CW jamming margin test as the processing gain test. In practice, this simple test has proven adequate to prevent misuse of the rules without preventing significant advancement of

the technology. It is in the interests of the users and of the industry to maintain the current test methods and so assure a stable basis for further technological advances.

Any additional alternative processing gain compliance tests must include the same level of detail as provided for the existing CW jamming margin test. This is the only practical means of minimizing the risk of interpretations that might invalidate the jamming margin test as an effective means of demonstrating compliance with the Commission's Rules.

In summary, the Committee supports the CW jammer test, together with the additional requirement for mathematical justification for systems utilizing codes with less than 10 chips as proposed in paragraph 15 of the NPRM and advises to refrain from adding an alternative Gaussian noise test as proposed in paragraph 14.

Respectfully,

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