

Suggestions for documents to file at FCC

Please let the FCC know we need to keep the 2.4 GHz radio spectrum useful for our Wireless Local Area Networks

The FCC is seeking comments from the public regarding the auctioning of, among others, an important frequency band (2402-2417 MHz) for "Emerging Technology services". The FCC received the use of the band from the USA government (the NTIA) in response to the Omnibus Budget Reconciliation Act of 1993. The FCC knows about the use of this band for Part 15 devices, but is statutorily obliged to follow up.

As the mentioned band takes about 20 % from the band we plan to use, we need to make those plans known to the FCC. Hopefully, by our efforts, we will have minimum loss of bandwidth to others for our exciting application.

Please find enclosed two proposals with suggestions that could be used for filing at the FCC. One is for (future) users of Part 15 devices in the 2.4 GHz band. The other is for vendors of those devices.

Please consider to file your own documents from these suggestions and file them on or before December 19, 1994 at the FCC. We have placed square brackets plus an @-sign at those places where you need to place information specific to your environment. We encourage "personification" of the filing as the value of the filing raises if it is not a carbon-copy.

Please file in time on the following address:

Office of the Secretary

Federal Communications Commission

Washington DC 20554

[FOR USERS]
Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of
Allocation of Spectrum Below
5 GHz Transferred from
Federal Government Use
ET Docket No. 94-32

To: The Commission

COMMENTS

[@Company name] respectfully submits the following comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM"), FCC 94-272, released November 8, 1994.

This NPRM proposes allocation of 50 MHz of spectrum that was identified by the Department of Commerce for transfer from Federal Government to private sector use. [@Company name] urges that one of the three segments comprising those 50 MHz remain usable spread spectrum devices because [@Company name] has plans to use the 2,400-2,483.5 MHz band for computer communications as soon as such devices are available. The advent of an interoperability standard being prepared by the IEEE P802 committee makes this band especially attractive for us to use.

[@Company name] is a \$ xxxxx company specialized in xxxxxxxxx, etc. We depend on mobile computers and wireless connectivity in our business environment to support [users, applications, functions and/or internal departments].

In § 18 of the NPRM, the Commission requests comments on retaining the segment 2,402-2,417 MHz of the 50 MHz for use by Part 15 devices. [@Company name] believes that such use should be allowed to continue. Removing 2,402-2,417 MHz from the band available in practice to Part 15 devices would limit the capacity of our future use and systems. This limitation would severely affect our ability to function. If [@Company name] could only choose between the three options mentioned in § 18, it would prefer the option "Maintaining Part 15 use of the band while limiting licensed use of the band".

However, [@Company name] requests that the Commissions raise the status of Part 15 devices to "co-primary" in order to prevent the possible new primary users from demanding cessation of operation of Part 15 devices upon detection of interference, however slight, from those devices.

In § 16 the Commission invites comments on the use of the 2,390-2,400 MHz band. [@Company name] requests that this band be used for unlicensed devices.

In § 19 of the NPRM the Commission also requests comments on two types of use in the 2,402-2,417 band. One type is the use by licensed services subject to technical rules similar to the rules for unlicensed Part 15 devices and the second use is by Mobile Satellite Service (MSS). While [@Company name] can not give detailed comment on the first of such use pending the availability of the rules, we regard the concept as potentially appropriate provided that the unlicensed devices are granted co-primary status. Coexistence studies covering the effects of MSS use on Part 15 devices and performed by the proponents of MSS use should be required before the Commission takes further action relative to this service.

Conclusion

The usefulness of the entire 2,400-2,483.5 MHz band for spread spectrum Part 15 devices should not be impaired by decisions by the Commission. To protect the existence of Part 15 devices in the 2,400-2,483.5 MHz band, their status should be changed to co-primary. The band 2,390-2,400 MHz should be allocated to unlicensed services.

Respectfully submitted,

Name of officer of the company

Dated

His function

Company name

Address

Town

Phone #

Fax #

[FOR VENDORS]
Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
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Federal Government Use)

To: The Commission

COMMENTS

[@Company name] respectfully submits the following comments in response to the Commission's Notice of Proposed Rulemaking ("NPRM"), FCC 94-272, released November 8, 1994.

This NPRM proposes allocation of 50 MHz of spectrum that was identified by the Department of Commerce for transfer from Federal Government to private sector use. [@Company name] urges that one of the three segments comprising those 50 MHz remain usable spread spectrum devices because [@Company name] has made considerable investments in the design and manufacturing of devices for operation in the 2,400-2,483.5 Mhz band for computer communications. Those investments would become vulnerable if the best part of the band is prohibited for use by Part 15 devices or is reduced in capacity due to new licensed users.

[@Company name] is actively participating in the work of IEEE P802.11 in making an interoperability standard in the 2,400-2,483.5 MHz band. Taking away the best 18% of the operating range of the spectrum, would reduce the market of devices operating according to the standard in the U.S. compared to abroad.

[@Company name is a \$ xxxxx company specialized in xxxxxxxxx, etc.]

In § 16 the Commission invites comments on the use of the 2,390-2,400 MHz band.

[@Company name] requests that this band be used for unlicensed data services.

In § 18 of the NPRM, the Commission requests comments on retaining the segment 2,402-2,417 MHz of the 50 MHz for use by Part 15 devices. [@Company name] believes that such use should be allowed to continue. Removing 2,402-2,417 MHz from the band available in practice to Part 15 devices would limit the capacity of systems built according to the future standard for use in the United

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States and would thus place the U.S. users of the standard in a worse position compared to similar users in other countries. If the [@Company] could only choose between the three options mentioned in § 18, it would prefer the option "Maintaining Part 15 use of the band while limiting licensed use of the band".

[@Company name] is developing a device working according to the Frequency Hopping rules. To meet the capacity requirements of the standard, the channel width needs to be 1 MHz. Taking away 15 MHz from unlicensed devices would reduce the 2,400-2,483.5 MHz band to less than 75 MHz, thus making it impossible to operate the devices in accordance with the rules of 47 CFR Section 15.247.

To protect the investments made by [@Company] in the development of both its product and of the standard of IEEE P802, we request the Commission to raise the status of Part 15 devices in the 2,400-2,483.5 MHz band to co-primary. That way, interference from our devices to the possible new services would not make our devices subject to demands for cessation of operation.

In § 19 of the NPRM the Commission also requests comments on two types of use in the 2,402-2,417 band. One type is the use by licensed services subject to technical rules similar to the rules for unlicensed Part 15 devices and the other type is the use by Mobile Satellite Service (MSS). While [@Company name] can not give detailed comment on the first such use pending the availability of the rules, we regard the concept as potentially appropriate. Coexistence studies performed by the proponents of MSS use are necessary before an informed recommendation can be made regarding use of the 2,402-2,417 band in this service.

Conclusion

The usefulness of the entire 2,400-2,483.5 MHz band for spread spectrum Part 15 devices should not be impaired by decisions by the Commission. To protect the existence of Part 15 devices in the 2,400-2,483.5 MHz band, their status should be changed to co-primary. The band 2,390-2,400 MHz should be allocated to unlicensed services.

Respectfully submitted,

Name of officer of the company

Dated

His function

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