To: 802.16 Broadband Wireless Access Working Group

From: 802.3 EFM Study Group

Subject: Comments received on 802.3ah PAR

Regarding your comment and suggested remedy 1, the EFM PAR does not presuppose that a new Media Access Control function will be defined for Ethernet PONs. To this point in the project, the majority of the technical proposals for EPONs do not make significant changes to the 802.3 MAC. We believe that the suggested change to the PAR scope would have the affect of drastically limiting the solution space, would be at odds with the majority of the technical work that has been performed on EPONs to date, and would not reflect the intent of the EFM Study Group.

It should also be noted that a change to the MAC Control protocol as defined in IEEE Std 802.3x-1997 Clause 31 would not constitute a change to the 802.3 MAC. MAC Control is a sublayer above the 802.3 MAC.

The suggested title change is inconsistent with the structure of the overall title.

Regarding your comment and suggested remedy 2, we recognize the expertise of the members of the 802.16 BBWA WG and welcome their contributions. We emphasize that P802.3ah will focus exclusively on *wireline* subscriber access networks, as opposed to *wireless* subscriber access networks. We believe that the suggested addition of 802.16 in the response to question 12 would be inappropriate because of the clear distinction between wireless and wireline networks within the IEEE 802 LMSC.

The normal practice in 802 PARs is not to include other 802 standards in the list of projects with similar scope, as this is a communication from the LMSC as a sponsor organization, to the IEEE-SA Standards Board, and the organization of work within a sponsor organization is the responsibility of the sponsor.