

**Wireless Communications Association International**

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Dr. Roger B. Marks
Chair, IEEE 802.16 Working Group
NIST
325 Broadway, MC 813.00
Boulder, CO 80305 USA

Re: Call for Comments Regarding Proposed IEEE 80-2.16e PAR

Dear Dr. Marks:

As the trade association of the wireless broadband industry, the Wireless Communications Association International ("WCA") takes great interest in the work of IEEE 802.16. Therefore, we appreciate the opportunity that you have provided by means of your open Call for Comments to offer a view regarding the proposed 802.16e project, which would extend 802.16's fixed broadband wireless access support to include mobile terminals.

WCA member companies (many of whom are service providers) have a great interest in this very topic. In particular, the U.S. spectrum known as the "MDS" bands has historically been allocated for fixed use. Recent regulatory changes by the FCC in response to WCA efforts provide the opportunity to use the spectrum for combination of fixed and mobile purposes. Our members see great opportunities here. WCA along with the National ITFS Association (NIA) and the Catholic Television Network (CTN) recently filed a white paper with the FCC proposing to revise the MDS regulations. The FCC's Public Notice (DA 02-2732) seeking comment on our proposal says that: "The proposal states that further rule changes are needed to facilitate provision of two-way fixed and mobile services." The joint WCA/NIA/CTN Oct. 7 filing is on WCA's website (<http://www.wcai.com/news.htm>) under "Government Affairs," half-way down the listing.

We understand that IEEE 802 is, very appropriately, concerned that standardization projects be based in market requirements. So, we assure you that many of WCA's members are looking forward with keen interest to deploying fixed/mobile broadband wireless metropolitan area networks, and would be very interested in the future output of the IEEE 802.16e project. In fact, this precise topic will be the subject of numerous business-oriented sessions this January in the Fairmont Hotel in San Jose, CA at *WCA's Ninth Annual Technical Symposium and Business Expo*, which is collocated with IEEE 802.16 Session #23. WCA's agenda may be seen on our website (<http://www.wcai.com/events.htm>) although several of these mobile/portable-oriented sessions are so new that the entire roster of participants has not yet been confirmed for publication. Please contact me if you have any questions or would like additional information.

Very truly yours,

A handwritten signature in cursive script that reads "Andrew Kreig".

Andrew Kreig/President