

Mark,

(1) We are concerned that the MBWA PAR has distinctly limited broad market potential because it is promoting a solution to directly compete with systems already developed or under development by worldwide partnerships of large, broadly supported Standards Development Organizations operating in coordination with the ITU. We understand that there is some argument that the MBWA PAR could lead to a more efficient data solution, but the market potential is limited nevertheless.

(2) We have heard from many corners that the MBWA PAR is not sufficiently distinct from the 802.16e PAR. If the difference between these two PARs is viewed as too small, then the difference between the MBWA proposal and the pre-existing mobile projects must certainly be too small to be considered distinct.

(3) The proposed name of the Working Group (“IEEE 802.20 Working Group on Mobile Broadband Wireless Access”) would introduce significant confusion if entered into the 802 panoply, given the current existence of the “Working Group on Broadband Wireless Access.”

(4) The “Expected Date of Submission for Initial Sponsor Ballot” (2004-05-26) is too optimistic for the following reasons:

- a) As a “clean slate” project, it is unrealistic to expect completion in less than three years, which is more typical of extension projects. IEEE 802 experience indicates that new projects from newly created Working Groups typically require at least three to four years.
- b) Because of the significant overlap of this potential project with large, pre-existing standardization efforts, a very close liaison with these groups will be required. This will involve exchanges of documents for coordination and review. Since these groups operate under their own schedules, this can cause significant delays in the Standards development process.
- c) Because of the significant overlap of this potential project with large, pre-existing standardization efforts, we fear that large numbers of participants from those projects would enter the 802 process with the express purposes of moving it toward their existing outside solutions. This could result in virtual gridlock that could take many years to resolve.

(5) T1P1 is "the Technical Subcommittee of Committee T1 responsible for Wireless/Mobile Services and Systems. Committee T1 is also a founding partner in the Third Generation Partnership Project (3GPP) which is responsible for the global standardization of GSM-based wireless."

When the project behind this PAR was originating, T1P1 wrote to 802.16 (IEEE L802.16-02/11): "It appears that the Study Group on Mobile Broadband Wireless Access Networks (MBWA) is addressing issues that are already being pursued by other global standards organizations. Our concern is this could result in duplicative and possibly counterproductive efforts."

If this project proceeds, how would you reply to T1P1?

(6) According to the “T1P1/2002-080 Report of T1P1 Meeting with Representatives of IEEE July 24,2002”:

“Mr. Klerer explained that an Executive Study Group had been formed under IEEE 802 to explore new work in the area of Mobile Broadband Wireless Access at vehicular speeds. Mr. Klerer noted that this work, which was being explored, was without relationship to any currently existing IEEE 802 standards, and the approach is to design an interface that is optimized for IP-based technology. He explained that the ultimate goal of this work would be to provide service optimized so that any application that works on the wired network will work seamlessly just as well on the wireless network. In response to a question of Mr. Mark Younge, Vice Chair of T1P1, Mr. Klerer noted that this type of technology could be used by different kinds of commuters —such as the passengers in cars as well as railway commuters. Dr. Chatterjee asked why Mr. Klerer had chosen to bring this work into IEEE, as opposed to say, T1P1. Mr. Klerer explained that he felt the best place for the work would be IEEE since it was to be based on a ‘pure-IP’ environment. He also noted that bringing it to IEEE would prevent any confusion about whether the technology had closer ties to 3GPP or to 3GPP2. He noted that ultimately the work would be brought to the groups such as T1P1 for their assistance and input. **Dr. Chatterjee extended an invitation to Mr. Klerer to bring this work into T1P1. He noted that T1P1.4 WWINA is doing work on a data-centric technology intended for Internet access, and that it was working well. Mr. Klerer expressed his gratitude at the offer but noted that he could not make a decision on a split from IEEE at this time. Mr. Klerer did note that it would be crucial to work this issue with T1P1, and also noted that he will bring T1P1’s offer forward to the rest of the members of the Executive Study Group for their consideration.**”

We would like to know the response of the Executive Committee Study Group to this invitation.

(7) Item 15 refers to the deficiencies in existing 3G systems for transporting data. Where these deficiencies do occur, they are primarily in the network architecture of current mobile systems and have little to do with the 3G air interface(s). It is not evident how the adoption of a new mobile air interface within IEEE 802 will result in a more cost-effective data solution when the issue is with the network architecture, not the air interface.

8) In item 18, the table lists a number of target parameters. 3GPP (UMTS) is currently standardizing a High Speed Data Packet Access mode with similar values. The 3GPP values are based on very rigorous real world simulations and manufacturers willingness to certify performance. Again, it is not evident that the air interface proposed in this PAR will result in features or capabilities significantly enhanced beyond other mobile systems currently being standardized.