
ET NPRM Draft Comments

I. IEEE 802 Background

The Institute of Electrical and Electronic Engineers (IEEE) is a USA-based international professional organization with more than 300,000 [to be checked] members representing a broad segment of the computer and communications industries. IEEE 802 is chartered by the IEEE Computer Society to produce standards for Local Area and Metropolitan area networks. These standards provide for data transfer between computers at data rates of 1 Mbit/s and higher on wire, optical and radio media.

To date, IEEE Project 802 has developed several widely recognized standards. Many of these have been forwarded to the International Organization for Standardization (ISO) and have been subsequently accepted as International Standards. The IEEE 802.11 working group of Project 802, has focused specifically on standards for high speed, on-premises Personal Communications Services for the radio transmission of digital information, so-called wireless local area networks, because they are among the most visible, immediate and rapidly emerging wireless digital applications. There is a high level of interest and participation by the working group, which consists of more than eighty active members and a mailing list of over 350 interested parties, which includes marketing and technical experts from most major computer, computer component and network equipment suppliers, governmental and non-government use organizations, and research institutes. Project 802 has forecast that it can be reasonably expected that an allocation from 70-140 MHz will be needed to satisfy the foreseeable demand for wireless LAN services. The Project also has determined that at least 70 MHz will be required to meet the immediate demands for wireless LANs in the near future.

II. Statement of General Comments

A. User Provided services are distinct from Carrier Provided

Spectrum and regulatory requirements are different.

B. User Provided services must be unlicensed to the end-user.

A class license may be required for the manufacturer.

C. Spectrum to be allocated for primary and exclusive use of user provided services

Co-primary and non-exclusive use does not facilitate efficient high-speed data transfers. (*See item 24.*)

D. Promote reconciliation with other domestic regulatory activities in order to facilitate common user hardware, spectrum and interoperation

Carrier-provided services should be as close as possible in frequency to user-provided services in order to enhance the possibilities for common hardware to be used to operate with both services.

E. Promote reconciliation with international standards efforts to facilitate use of common spectrum and interoperability of user provided services

Hardware should have the maximum mobility possible.

III. Specific Item Comments

A. Item 24 - "Relocation Proposal"

Sharing on a co-primary basis with fixed microwave services will not work in the general case. Co-primary and non-exclusive use does not facilitate efficient high-speed data transfers. The fifteen year transition period proposed is far too long.

B. Item 26 - "Buy-Out Proposal"

The proposed scheme by the Commission will not work in the case of user provided services. User-provided services have no mechanism to buy out incumbents.

C. Item 27 - "Other Relocation Ideas"

The timetable suggested by the Commission is not acceptable. We suggest that the FCC come up with a better plan which would accomplish this goal much earlier. If at least 70 MHz of spectrum is not allocated for this service immediately, then it is necessary that the Commission publish a timetable which specifies the timing and frequency placement of future allocations.