

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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

To: The Commission

COMMENTS

IEEE 802, the LAN MAN Standards Committee (“the Committee”) 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. The Committee urges that one of the three segments comprising those 50 MHz remain usable spread spectrum devices. On November 10, 1994, the Committee decided that its current draft for a standard for short-distance infra-red and radio Local Area Networks (LANs) has reached a level of maturity, sufficient for a formal letter ballot. That draft standard uses the 2.400 - 2.483.5 GHz band for the transfer of computer data adhering to the Commission’s rules under 47 C.F.R § 15.247 and to the comparable rules in over 40 countries. The Committee has selected the band for its wide availability throughout the globe for use by non-licensed devices.

In § 18 of the NPRM, the Commission requests comments on retaining the segment 2402-2417 MHz of the 50 MHz for use by Part 15 devices. The Committee believes that such use should be allowed to continue. Removing 1402-2417 MHz from the band available in practice to Part 15 devices would limit the capacity of the systems built according to the future standard for use in

the United 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 Committee could only choose between the three options mentioned in § 18, it would take the option “Maintaining Part 15 use of the band while limiting licensed use of the band”.

In § 19 of the NPRM the Commission requests comments on two types of use in this band, use by licensed services subject to technical rules similar to the rules for unlicensed Part 15 devices and use by MSS. While the Committee can not give detailed comment on the first of 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 decision can be made.

Conclusion

The usefulness of the entire 2400-2483.5 MHz band for spread spectrum Part 15 devices should not be impaired by decisions by the Commission.

Respectfully submitted,

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Dated