
IEEE P802.11
Wireless LANs

Procedure for Filing Comments to the FCC Regarding RF Lighting Devices
(ET Docket No. 98-42)

Date: November 12, 1998

Author: Jim Zyren
Harris Semiconductor
Melbourne, FL, USA
Phone: (407)729-4177
Fax: (407)724-7886
e-Mail: jzyren@harris.com

Abstract

The FCC is now considering a rules change that will allow the use of RF lighting devices in the 2.4 GHz band. The result of this ruling may have a significant impact on Part 15 devices. The period for submission of comment to the FCC in this matter has officially closed. However, comments may still be submitted to the Commission until about December 1, 1998 by the procedure described in this submission.

Electronic Filing

It is possible to file comments electronically. To file electronically, go to <http://www.fcc.gov/e-file/ecfs.html> and follow the instructions there. However, it should be pointed out that this system is presently overloaded and slow. The preferred method to file comments to the FCC on paper as described below.

Written Comments by Letter (Ex Parte Filing)

The period for submission of comments directly to the Commission has expired. However, comments can still be made to the Secretary of the FCC, Ms. Magalie R. Salas. Copies can then be sent to the Commissioners.

To file on paper, send the original and one copy of a letter to the following address.

Magalie R. Salas, Esquire
Secretary
Federal Communications Commission
1919 M Street NW
Room 222
Washington DC 20554

It is also recommended that a diskette should be enclosed along with the letter in WordPerfect 5.1 format, labeled with the name of the organization authoring the letter and the designation "ET Docket No. 98-42 -- Ex Parte Filing."

Suggestions Regarding Content of the Letter

1. Open the letter:
Re: ET Docket 98-42

"Dear Ms. Salas:"

2. In drafting the text of the letter, open by identifying your organization. Explain what the organization does, and how the FCC proceeding affects your organization.
3. Identify the specific issues you are commenting on.
4. Say what you want the FCC to do. For example, some Part 15 manufacturers have proposed imposing in-band limits at the Class A level for indoor lights, and relaxing that by 20 dB for outdoor lights. In this particular proceeding, a request that the FCC delay a decision pending further study is unlikely to be welcome, as the FCC has expressed its hope of wrapping the proceeding by the end of calendar 1998.
5. Next, justify your request. In the proceeding, we have to overcome a 50-year-old rule that gives Part 18 equipment unlimited emissions rights in the ISM bands. Some Part 15 groups have been arguing that the \$1 billion/year investment in 2.4 GHz wireless equipment and the extensive economic benefits arising from that investment, justify rethinking unlimited emissions for ISM.
6. Include any documented facts and hard numbers that support your position. The FCC is typically inundated with rhetoric and starved for facts.
7. Close the letter, "Respectfully Submitted."
8. Show "cc" copies to the following:

Chairman William E. Kennard
Commissioner Susan Ness
Commissioner Harold Furchgott-Roth
Commissioner Michael K. Powell
Commissioner Gloria Trastani
Dale Hatfield
Julius P. Knapp
Karen Rackley
John A. Reed
Anthony Serafini

The five commissioners are at this address:

Federal Communications Commission
1919 M Street NW
Eighth Floor
Washington DC 20554

The other five staff members are at this address:

Office of Engineering and Technology
Federal Communications Commission
2000 M Street NW
Fourth Floor
Washington DC 20554

Acknowledgement

Many thanks to Mitchell Lazarus of Fletcher, Heald, & Hildreth, PLC for preparation of the procedure described above