

EX PARTE OR LATE FILED

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October 21, 1996

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William S. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W.; Room 222
Washington, D.C. 20554

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OCT 21 1996
Federal Communications Commission
Office of the Secretary

Re: Notification of *Ex Parte* Contact in ET Docket No. 96-102

Dear Mr. Caton:

The Wireless Information Networks Forum ("WINForum") hereby notifies your office of an *ex parte* contact in the above referenced docket. On October 16, 1996, Donald C. Johnson and Chandos Rypinski from WINForum and Robert L. Pettit and Eric W. DeSilva, WINForum's counsel, met with David Wye and Elizabeth Lyle from the FCC's Wireless Telecommunications Bureau and Karl Kensinger from the FCC's International Bureau to discuss issues raised in the attached leave-behind.

If you have any questions regarding this notification, please do not hesitate to contact the undersigned at (202) 828-3182.

Respectfully submitted,



Eric W. DeSilva

Encl.

cc: David Wye, FCC-WTB
Elizabeth Lyle, FCC-WTB
Karl Kensinger, FCC-IB

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**WINFORUM 5.2 GHZ SHARING RULES DRAFTING COMMITTEE (SRDC)
STATUS**

10/09/96

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Federal Communications Commission
Office of Secretary



WINFORUM
Wireless Information Networks Forum, Inc.

SHARING RULES DRAFTING COMMITTEE (SRDC)

SCOPE AND OBJECTIVES

Draft the Sharing Rules for NII/SUPERNet

Minimum Regulatory Framework to Permit Spectrum Coexistence

Ensure Coexistence with other Radio Services in the same or Adjacent Spectrum

Enforceable by Compliance Testing of Equipment

Perform Studies and Analysis Concerning Coexistence with Other Radio Services

SHARING RULES DRAFTING COMMITTEE (SRDC)

APPROACH

Requirements, Goals and Issues Definition

Resolve Issues - Strive for Consensus

Draft the Rules

STATUS

Requirements, Goals and Definitions Underway

One Proposal for A Rules Structure Tabled

SHARING RULES DRAFTING COMMITTEE (SRDC)

SOME ESTABLISHED REQUIREMENTS AND GOALS

Two Sets of Rules

Class1: Low Power, Short Range, Either Band

Class2: Higher Power, Upper Band Only, Longer Links

Network Access and Interoperability

Intra-Building Multimedia Communication and

**Interconnection to Broadband Networks for Inter-Location Multimedia
Communication**

Support Access to the National Information Infrastructure

**Support for Wireless ATM Quality of Service Goals to Extent Consistent with Fair Spectrum
Sharing**

Goal: Achieve International Agreement on Sharing Rules for 5.2 GHz Band

Seeking Cooperation with ETSI

SHARING RULES DRAFTING COMMITTEE (SRDC)

SOME ISSUES

At this stage any matter is listed as an issue if any opposition to a position has been voiced. Some issues have proposed solutions supported by the majority.

Interim Rules

Majority Position: If Issued, Limit to Upper Band

Power and EIRP

Current Lower Band Estimate:

250 mw and 0 dBW EIRP for 40 Meter In-Building

Technologically Neutral Levels With Spread Spectrum in Upper Band

Main Out-of-Band Concern is MLS Below Lower Band

Channelization

Whether Single Emission Bandwidth (or Channel Separation)

Assignment of Frequencies, if Limited Number of Channels

WINForum Position: Single Emission Bandwidth of about 25 MHz

SHARING RULES DRAFTING COMMITTEE (SRDC)

SOME ISSUES (CONTINUED)

At this stage any matter is listed as an issue if any opposition to a position has been voiced. Some issues have proposed solutions supported by the majority.

Antenna Gain in Lower Band

Distributed Versus Centralized Control

Means of Usage Assessment

LBT

Receiver Listen

System Level Assessment

RLS Sharing

Principal Concern is Control of Susceptibility

Interference to Ground-based RLS Not as Major a Concern

Means of Enforcing Spectrum Efficiency

Consensus: Modulation Efficiency Not Sufficient

SHARING RULES DRAFTING COMMITTEE (SRDC)

MSS COEXISTENCE

GlobalStar and AirTouch Concerns

Principal Issues

Indoor/Outdoor Deployment Ratio

Transmitter “on” Time Ratio

Antenna Gain and Its Effects

Space Receiver Interference Threshold

SHARING RULES DRAFTING COMMITTEE (SRDC)

GLOBALSTAR

Questions ITU-R 4A/66E Conclusions on HIPERLAN

Changed System - Iso-Flux pattern

Differences Between HIPERLAN and NII SUPERNet

Proposes 0.1% Limit on Noise Floor Increase (.004 dB increase in noise floor)

WINForum :

**Using ITU-R 4A/66E with Updated Parameters, Over 300 Million Devices
Create Less Than a 2% Noise Floor Increase (0.09 dB increase in noise floor)
(WINForum letter to US WG 4A Chairman)**

At Issue

Transmitter Duty Cycle

Building Excess Attenuation

Indoor/Outdoor Device Deployment Ratio



SHARING RULES DRAFTING COMMITTEE (SRDC)

AIR TOUCH COMMENT SUMMARY

Principal Use of 5.15-5.25 GHz Band will be Outdoor, Directional Point-to-Point Links.

**Claims 60% of Devices Outdoor
50% Transmitter Duty Cycle**

Implies Trunking of Both Wired and Wireless Local Network Generated Traffic

At least 50 Mobile Wireless Devices per Wireless Trunk if Wireless Only

Claims 27% Reduction in MSS Throughput

SHARING RULES DRAFTING COMMITTEE (SRDC)

COMMENTS ON AIRTOUCH POSITION AND ANALYSIS

Outdoor Application in MSS Shared Band will be Short Range Mobile

The ITU-R 4A/66E Modification Submitted by WINForum is Correct for Indoor/Outdoor Ratio and Transmitter Duty Cycle.

Unfavorable Analysis Assumptions Under Study

10 Degree Grazing Angle: 2500 Mile Coverage Radius (20 Million Square Miles)

Globalstar claims only about 3 million square miles (977 mile radius and 37 degree angle)

No Excess Attenuation

Unrealistic Antenna Pattern:

Average gain >1

35 - 45% of Power in Sidelobes.

5% Power in Sidelobes is High Range

Usual Point-to-Point Link Antenna Gain Much Higher (Multipath Considerations)

Typically 40 dB

