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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
RM No. 9514

In the Matter of

Amendment of Part 18 of the Commission's)
Rules To Update ISM Regulations And Promote)
Deployment of New, High Bandwidth)
Communications Devices)

COMMENTS OF HEWLETT-PACKARD COMPANY

Hewlett-Packard Company ("HP") hereby submits its comments in support of the petition for rulemaking filed by the Millimeter Wave Communications Working Group ("MWCWG").¹ In its petition, the MWCWG urged the Commission to amend Part 18 of its rules to harmonize the in-band emission limits applicable to Industrial, Scientific and Medical ("ISM") devices operating in the 61.0-61.5 GHz band with those that govern unlicensed devices operating in the 59-64 GHz band. HP has played a leading role in the development of the 59-64 GHz unlicensed band.

Today, HP is developing products capable of delivering high speed, low cost communications using the 59-64 GHz band, in part because the Commission made available an unprecedented 5 GHz of spectrum for unlicensed use. This resource is unlike any other that exists today, in terms of its size and its freedom from other uses. As a result, it can support the type of high-bandwidth, short range communications applications that are becoming increasingly important in our information-based society.

HP is concerned, however, that unrestricted deployment of ISM devices at 61.0-61.5 GHz will threaten the potential of the 59-64 GHz unlicensed band. Unless ISM devices are required to meet reasonable in-band emissions limits, equivalent to those that have been imposed on communications devices, they could substantially restrict the usefulness of 59-64 GHz band. This, in turn, effectively will subdivide the band into two

¹ The petition was placed on public notice on March 18, 1999. Public Notice (92450), "Petitions for Rulemaking Filed," Report No. 2322 (Mar. 18, 1999).

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considerably less useful segments and forever will destroy what the Commission sought to create in its millimeter wave proceeding.

HP, therefore, supports the MWCWG's petition and urges the Commission to move expeditiously to initiate a rulemaking addressing ISM use of the 61.0-61.5 GHz band. By taking appropriate steps at this time — in particular, before ISM devices are deployed in the band — the FCC can ensure that new short range communications devices using the band 59-64 GHz can co-exist with ISM uses.

HP is not advocating a broad-scale review or revision of ISM/Part 15 sharing rules. HP strongly believes that the limits proposed in the MWCWG petition should be applied only to the 59-64 GHz band and that new limits should not be considered for other ISM frequencies. The Commission should resist broadening the focus of the proposed rulemaking or adding any other restrictions to those proposed by the MWCWG. Any attempt to adapt the proposed restrictions to other ISM bands that already are heavily used would create unnecessary burdens for all concerned. In contrast, because 60 GHz ISM devices have not yet been deployed, the ISM community could integrate any new requirements into their product planning process. Also, HP is not advocating any limitations on the operating power of ISM devices. Rather, the company supports the MWCWG's petition asking for reasonable limits on emissions only.

Respectfully submitted,

A handwritten signature in black ink that reads "Cynthia Johnson". The signature is written in a cursive, flowing style.

Cynthia Johnson
Federal Public Policy Manager
Hewlett-Packard