

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Amendment of the Commission's Rules)	RM-9498
For Unlicensed Personal Communications)	
Services)	

COMMENTS

The User Premises Equipment Division (“UPED”) of the Telecommunications Industry Association (“TIA”)¹ hereby submits its comments to the Wireless Information Networks Forum (“WINForum”) Petition for Rulemaking filed in RM-9498, Public Notice Report No. 2320.

As a sponsor of the formulating group which was the developer of three air interface standards for the isochronous portion of the Unlicensed Personal Communications Services (“UPCS”) band, UPED supports WINForum’s request that the FCC promptly issue a Notice of Proposed Rulemaking (“NPRM”) consistent with the proposals in WINFORUM’s Petition. The mission of UPED’s TR 41.6, Wireless User Premises Equipment Systems Engineering Subcommittee, established in 1994, is to develop air interface standards for

¹ The Telecommunications Industry Association is a full-service national organization with membership of over 900 large and small companies which provide communications and information technology products, materials, systems, distribution services and professional services in the United States and countries abroad. TIA represents the telecommunications industry in association with the Electronic Industries Alliance. The User Premises Equipment Division represents those TIA members with an interest in terminal equipment and customer premises equipment and distribution systems. This filing represents a consensus of those members. Individual TIA members may file their own

equipment operating in the UPCS band. This Engineering Subcommittee has completed three air interface standards for the UPCS band:

- TIA/EIA-662, "Personal Wireless Telecommunications Standard (PWT);"
- TIA/EIA-663, "Personal Communications Interface Interoperability Standard (PCI);" and
- TIA/EIA-667, "Personal Access Communications System Wireless User Premises Equipment (PACS-WUPE) Air Interface Standard."

Wireless private branch exchange ("PBX") systems have been deployed based on these three standards and the market demand for these systems continues to grow. For example, a market analysis by Phillips InfoTech found a growth of 60 percent in the third quarter of 1998 for in-building wireless handsets shipped worldwide compared with the third quarter of 1997.

Currently, Engineering Subcommittee TR41.6 is augmenting these standards to support additional data capabilities such as packet-mode data, circuit-mode data, short messaging and access to public data networks such as the Internet and Integrated Services Digital Networks ("ISDN"). UPED supports the rule changes proposed by the WINForum petition because such changes will provide isochronous devices additional spectrum to support the demands of these wireless data services.

comments to amplify or elaborate on any issues of concern to that company or organization.

CONCLUSION

The Telecommunications Industry Association User Premises Equipment Division respectfully requests that the FCC promptly issue an NPRM consistent with the proposals in WINForum's Petition.

Respectfully submitted,

Telecommunications Industry
Association
User Premises Equipment Division

By: _____

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