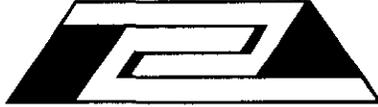


**ABRACON  
CORPORATION**



CRYSTALS • OSCILLATORS • INDUCTORS

**ORIGINAL**

In Matter of

Amendment of Part 15 of the Commission's Rules )  
Regarding Spread Spectrum Devices )  
Notice of Proposed Rulemaking )

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ET Docket No. 99-231 SEP 22 1999  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**COMMENTS**

Abracon Corporation strongly encourages the Commission to amend the rules for spread spectrum systems operating in the 2.4 GHz band, as proposed Notice of Proposed Rulemaking ET 99-231. As a supplier to the wireless networking industry, Abracon Corporation benefits from increased innovation in the use of broadband spread spectrum technologies, and we applaud the commission's efforts to improve competition and fairness in the unlicensed ISM band.

Abracon Corporation supplies frequency control and Magnetic components to manufacturers of wireless LAN equipment, and therefore our customers and our company benefit directly from advances in spread spectrum technology in the 2.4 GHz band. The rule changes proposed in the above-referenced NPRM will drive the development of higher performance wireless products, expanding the industry and related companies.

Through our long experience in the wireless industry, we have learned that frequency hopping spread spectrum is an ideal technology for broadband applications, such as Internet and mobile multimedia access. The reduced development cost, high interference immunity, and low power consumption of frequency hopping systems allow very cost-effective wireless products to be developed. The industry will benefit even further from the higher data rates made possible by the Commission's proposal.

We believe the proposed changes will allow more fair access to the available frequencies in the 2.4 GHz band with no additional interference with existing users. This will expand the overall usage of this valuable spectrum.

For all these reasons, we urge quick adoption of the Commission's proposal in this proceeding.

Respectfully submitted,

Abracon Corporation

Christopher Polley - President  
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