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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

**AMENDMENT OF PART 15 OF THE COMMISSION'S
RULES REGARDING SPREAD SPECTRUM DEVICES**

ET Docket No. 99-231

COMMENTS OF CISCO SYSTEMS, INC.

Cisco Systems, Inc. would like to clarify for the record in this proceeding that it does not support the rule changes proposed by the HomeRF Working Group ("HomeRF") to permit unlicensed wideband spread spectrum communications devices to operate in the 2.4 GHz band.

In its letter of November 11, 1998 proposing the rule changes, HomeRF attached a list of what it described as "[s]upporting companies participating in the HomeRF Working Group."¹ Apparently, the Commission assumed that all of the listed companies that supported HomeRF in general also supported the wideband proposal in particular.²

That assumption was incorrect. Although Cisco was a member of HomeRF at the time the list was submitted, it is not a supporter of HomeRF's specific proposal for wideband spread spectrum devices in this band. As the Commission has noted, at least

¹ See Letter from Ben Manny, Chairman of HomeRF, to Dale Hatfield, dated November 11, 1998.

² In the Notice of Proposed Rulemaking in this proceeding, the Commission "observe[s] that the HRFWG proposal is supported by fifty-three wireless radio companies." *Amendment of Part 15 of the Commission's Rules Regarding Spread Spectrum Devices*, FCC 99-149 at ¶8 (rel. June 24, 1999).

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one other company listed by HomeRF has also indicated that it does not support HomeRF's proposal.³

For the record, Cisco wishes to clarify that it does not support the rule changes proposed by HomeRF and the Commission in this proceeding. And, indeed, it is no longer a member of the HomeRF Working Group.

Respectfully submitted,

CISCO SYSTEMS, INC.

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³ *Id.* at n. 5.