

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

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
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AMENDMENT OF PART 15 OF THE COMMISSION'S )  
RULES REGARDING SPREAD SPECTRUM DEVICES )  
)  
)  
)

ET Docket No. 99-231

REPLY COMMENTS OF MICROSOFT CORPORATION

Microsoft Corporation would like to clarify for the record in this proceeding that it neither supports nor opposes 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 "[s]upporting companies participating in the HomeRF Working Group."<sup>1</sup> Apparently, the Commission assumed that all of the listed companies that supported HomeRF in general also supported the wideband proposal in particular.<sup>2</sup>

That assumption was not correct. Microsoft was and still is a member of HomeRF. However, it neither supports nor opposes HomeRF's specific proposal for wideband spread spectrum devices in this band. Microsoft does urge the Commission to

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

<sup>2</sup> 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 ¶18 (rel. June 24, 1999).

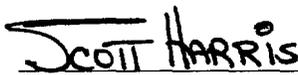
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exercise caution, as it traditionally does, before taking any action that would cause additional, harmful interference in the unlicensed spectrum. The Commission must carefully review any proposed rule changes within the 2.4 GHz band to ensure to the greatest degree possible that harmful interference to existing systems is minimized.

Respectfully submitted,

MICROSOFT CORPORATION

By:   
Scott Blake Harris  
William M. Wiltshire

HARRIS, WILTSHIRE & GRANNIS LLP  
1200 Eighteenth Street, N.W.  
Washington, D.C. 20036  
202-730-1300

*Counsel for Microsoft Corporation*

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