

LAW OFFICES  
GOLDBERG, GODLES, WIENER & WRIGHT  
1229 NINETEENTH STREET, N.W.  
WASHINGTON, D.C. 20036

ORIGINAL

HENRY GOLDBERG  
JOSEPH A. GODLES  
JONATHAN WIENER  
W. KENNETH FERREE  
SHERYL J. LINCOLN  
HENRIETTA WRIGHT  
THOMAS G. GHERARDI, P.C.  
COUNSEL

(202) 429-4900  
TELECOPIER:  
(202) 429-4912

e-mail:  
general@g2w2.com

DOCKET FILE COPY ORIGINAL

March 23, 2000

RECEIVED

MAR 23 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. Dale N. Hatfield  
Chief, Office of Engineering and Technology  
Federal Communications Commission  
The Portals, 445 12<sup>th</sup> Street, S.W.  
7<sup>th</sup> Floor  
Washington, D.C. 20554

Re: Amendment of Part 15 of the Commission's Rules  
Regarding Spread Spectrum Devices, ET Docket No. 99-231

Dear Mr. Hatfield: :

On February 23, 2000, Proxim, Inc. responded to an *ex parte* submission of the Wireless Ethernet Compatibility Alliance ("WECA"). The following further supplements that response.

In its February 23<sup>rd</sup> response, Proxim pointed out that, if the Commission decides to modify its proposal in the above-referenced proceeding and adopt non-overlapping channels, the Commission should not simply adopt the same rules that apply in Europe, which require at least 20 non-overlapping channels. Instead the Commission should allow 3 or 5 MHz channels with reduced maximum transmit power as already proposed and then stipulate that the total span of consecutive non-overlapping channels must be at least 75 MHz. Also, for consistency, the time spent on any non-overlapping WBFH channel should not exceed .4 sec for every period of 30 sec divided by the channel spacing in MHz.

Attached hereto is a draft modification of Section 15.247 of the Commission's rules incorporating these suggested changes, with the changes shown in italics.

No. of Copies rec'd \_\_\_\_\_  
List A B C D E

0+4

Mr. Dale N. Hatfield  
March 23, 2000  
Page 2

Please direct any questions regarding this matter to the undersigned.

Sincerely,  
  
Henry Goldberg  
Attorney for  
Proxim, Inc.

Attachment

## Draft Amended 15.247 Frequency Hopping Regulations

15.247

(a) (1)

(ii) Frequency hopping systems operating in the 2400-2483.5 MHz band shall use at least 75 hopping *channel carrier* frequencies *if the 20 dB bandwidth of the hopping channel is 1 MHz or less. Alternatively, the 20 dB bandwidth of the hopping channel may be either 3 MHz or 5 MHz. The average time of occupancy within any hopping channel shall not be greater than 0.4 seconds within a period of 30 seconds, or a period of 30 seconds divided by the 20 dB hopping channel bandwidth in MHz, whichever is less. If the 20 dB bandwidth of the hopping channel is greater than 1 MHz, the hopping channel carrier frequencies shall be separated by the 20 dB bandwidth of the hopping channel and the total span of contiguous hopping channels shall be at least 75 MHz.*