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RECEIVED

MAY 22 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 22, 2000

Ms. Magalie Salas
Office of the Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W., Room TW-A325
Washington, D.C. 20554

Re: Amendment of Part 15 of the
Commission's Rules Regarding Spread
Spectrum Devices, ET Docket 99-231

Dear Ms. Salas:

On May 17, 2000, four companies - 3Com, Ericsson, Lucent, and Nokia - purporting to speak for the Bluetooth Special Interest Group ("Bluetooth SIG")¹, filed an *ex parte* letter in the above-referenced proceeding opposing the Commission's proposal on grounds that the changes proposed to Part 15 will undermine Bluetooth. This response is filed on behalf of Proxim, Inc..

A cursory reading of May 17th letter might give the impression than the Bluetooth SIG opposes the Commission's proposal. This, however, is not the case. Of approximately 1,400 Bluetooth member companies, approximately 20, or less than 1.5%, submitted letters of opposition to the Commission's proposal. Moreover, a similar number of Bluetooth member companies sent letters of support for the Commission's initiative. With no clear consensus and over 95% of the membership expressing no

¹ The Bluetooth 1.0 Specification describes a radio system protocol for establishing very short range point to point links (or "cable-replacements") for connecting intelligent electronic devices such as cellular telephones, notebook computers and personal digital assistants.

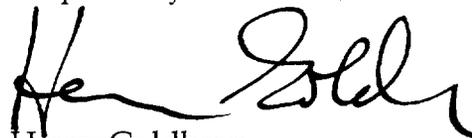
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opinion, the Bluetooth SIG took a neutral position with respect to the Commission's proposal.²

With respect to the substance of the May 17th *ex parte* letter, deployment of wide band frequency hopping technologies will not have a detrimental effect on Bluetooth transmitters. Detailed measurement and analysis of the measurement data have shown no significant increase in interference to Bluetooth devices from wide-band frequency hopping devices. If, however, a Bluetooth device were to encounter a high-speed direct sequence device in the situation described in the referenced May 17th letter, the direct sequence device would represent 10 times the bandwidth and five times more power than proposed by the Commission for wide band frequency hopping devices. Therefore there is a higher risk of significantly increased interference to Bluetooth devices from direct sequence devices.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Henry Goldberg". The signature is fluid and cursive, with a large initial "H" and "G".

Henry Goldberg
Attorney for Proxim, Inc.

cc: Dale Hatfield
Julius Knapp
Karen Rackley
Neil McNeil

² See Comments of the Bluetooth Special Interest Group submitted in this proceeding by James Kardach, chairman Bluetooth SIG.