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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

30 May 2000

Ms. Magalie Roman Salas
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Notice of Ex Parte Communication: OT Docket No. 99-231*

Dear Ms. Salas:

On 26 May 2000, Eric Benhamou, CEO of 3Com Corporation, contacted FCC Chairman William Kennard about the above-captioned matter. Mr. Benhamou made the following points:

(1) In this proceeding, the Commission is proposing changes to its Part 15 rules that would permit frequency-hopping systems to use wider bands and greater power.

(2) The problem is that the proposed rule changes would permit harmful interference to virtually all spread spectrum systems that comply with existing Part 15 rules. This means that the rule changes would degrade more than a billion of dollars of communications infrastructure.

(3) The proposed rule changes would severely undermine the high-speed wireless LAN industry, which has just reached the stage where widespread deployment is around the corner.

(4) For all their destructive potential, the wider-band systems envisioned under the proposed rules would have no better performance capabilities than systems currently available under the newly-adopted 802.11 industry standard that complies with the existing rules.

(5) These wider-band systems would also cause harmful interference to Bluetooth technology.

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(6) As a result of these various interference concerns, the Commission's proposal, which has been championed by the HomeRF group, has been opposed by 3Com, Lucent, Cisco, Nokia, Ericsson, Symbol, Wayport, Intersil, and others.

(7) Not all HomeRF members have supported the HomeRF proposal. In fact, several companies, including Microsoft and Cisco, have submitted letters clarifying that they did not support the HomeRF proposal – as had been suggested in the original NPRM.

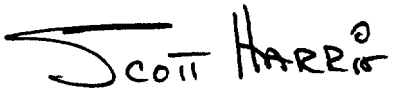
(8) The obligation of Part 15 devices to accept interference from other Part 15 devices does not excuse a change in the Part 15 rules that creates additional and unnecessary interference.

(9) While it is true that under the current rules frequency hopping devices cannot match the speed of direct sequence devices, the harm caused by changing the rules to "equalize" the speeds outweighs the benefit. Nor is there any "unfairness" in making all parties act in accordance with the rules.

(10) The Commission just a few years ago, because of the undue interference that would have been caused, rejected an almost identical proposal for wider-band frequency-hopping devices. Nothing has changed since then to suggest a different result is warranted.

(11) The bottom line is that this proposal is a bad idea that will cause harmful interference to two key new technologies: Wi-Fi (802.11b) and Bluetooth. This would hurt consumers and would not be in the public interest.

Respectfully submitted,



Scott Blake Harris
Counsel for 3Com Corporation

cc: The Honorable William E. Kennard