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June 23, 2000

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VIA COURIER

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 Twelve Street, S.W., Room TWB204
Washington, D.C. 20554

Re: Intersil Corporation
***Ex Parte* Presentation**
Amendment of Part 15 of the Commission's Rules Regarding Spread Spectrum Devices, ET Docket No. 99-231

Dear Ms. Salas:

Intersil Corporation ("Intersil"), pursuant to Section 1.1206 of the Commission's Rules, is writing to report an oral *ex parte* presentation with the Commission regarding the above-referenced matter. Present at the meeting were Jim Zyren and Larry Ciaccia of Intersil, Catherine Wang and Nancy Killien Spooner of Swidler Berlin Shereff Friedman, and Adam Krinsky, Legal Advisor to Commissioner Gloria Tristani.

During the meeting, Intersil submitted a written *ex parte* communication, a copy of which is attached to this letter. The original and one copy are enclosed for filing in the above-referenced proceeding. Intersil previously submitted comments and reply comments in this proceeding.

Please date-stamp the extra copy of this letter and return it in the enclosed envelope. If you have any questions regarding this filing, please contact James Zyren at (407) 729-4177.

Very truly yours,

Larry Ciaccia
Vice President, Engineering
Intersil Corporation
2401 Palm Bay Road
Palm Bay, FL 32903

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List A B C D E

Harmful Interference

- Changes will harm existing systems
  - OET largely agrees with technical findings of WECA
  - OET asserts that Part 15 must accept interference

- Intersil agrees with WECA:
  - Part 15 must accept interference from AUTHORIZED devices operating in accordance with FCC Rules
  - Interference to Part 15 must be weighed carefully when considering NEW services or rules
    - to ignore interference to Part 15 places investment in this band in a state of continuous peril

FCC Has Already Rejected WBFH Due to Deep Concern of Harmful Interference

- FCC previously rejected near-identical proposal:

  *"We have **serious concerns** that implementing Symbol's requested change could result in **severe** increases in the potential for harmful interference."* NPRM (ET Docket 96-8, 11 FCC Rcd. 3068 (1996)).

  - Symbol proposed WBFH systems in 1995
  - FCC rejected Symbol petition in 1997
    - Symbol was actually seeking less bandwidth than allowed under current proposal
    - FCC described proliferation of large number of devices for consumer apps along with reduction in number of channels

The HomeRF Proposal Will Harm U.S. Consumers

Existing Part 15 technology (including 802.11b devices) is an integral component of broadband in the home and small office.

According to the U.S. Small Business Administration*:

- 53% of U.S. small businesses are home-based.
- Businesses with 1-4 employees created 60% of all new U.S. jobs from 1994-1998.
- In 1998, small office/home office (SOHO) businesses with fewer than 5 employees spent $7.3 billion on computer hardware (much more aggressively than larger businesses).

Industry projections indicate that conservatively, U.S. consumers will spend $3 billion on WLAN computer hardware in 2000.

* Sources: *Small Business Expansion in Electronic Commerce, U.S. Small Business Administration Office of Advocacy,* June 2000; *Small Business Answer Card 1998, U.S. Small Business Administration Office of Advocacy.*

WBFH Threatens Multi $Billion Investment

- IEEE 802.11b currently selling 10 M units/year
  - over $2B annual investment in DSSS alone
- Bluetooth radios will sell >100 M units in 2002
  - Bluetooth will be in every cell phone by 2004
- WBFH proponents assumptions are flawed
  - Proponents assume only 1 type of system per home; BAD assumption
    - WBFH targeted at home; 53% of small businesses are home-based
    - IEEE 802.11b ALREADY included in ADSL gateway products from Alcatel and Nokia aimed at homes
    - Bluetooth will be ubiquitous
    - Consumers and small business should not be left to sort out the mess.

Current Rules are Technology Neutral

- No rule change was required for DSSS systems
  - DSSS radios reached 11 Mbps speed under current rules
- WBFH performance will be dubious even under new rules
- WBFH proponents have announced plans to bring out their own IEEE 802.11b products

WECA has Offered Compromise

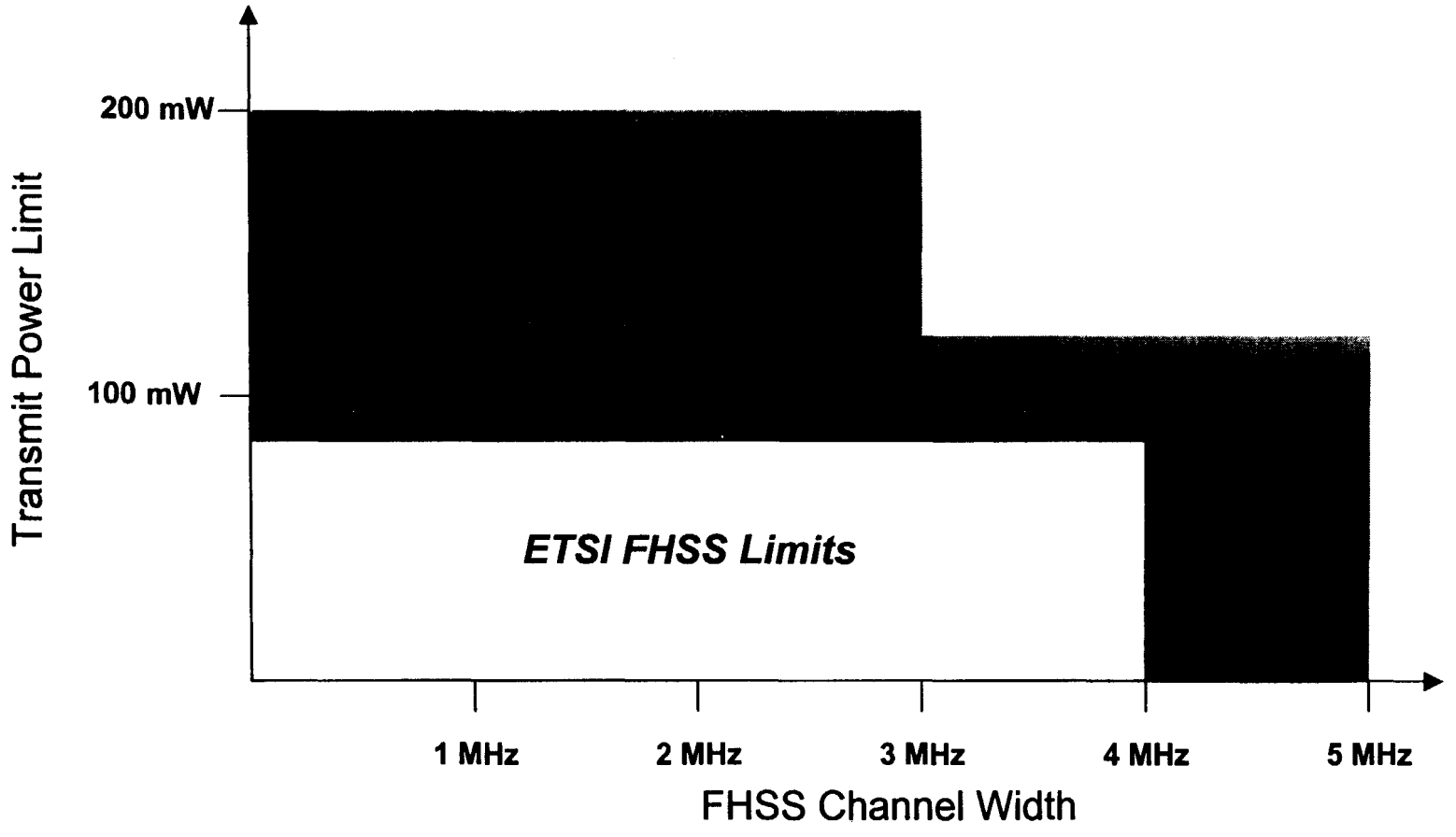
- WECA Compromise
  - harmonizes US and European rules for FHSS
  - provides flexibility for FHSS manufacturers to achieve higher data rates and serve new applications
  - provides meaningful protection for Part 15 equipment properly authorized under current FCC Rules

- Harmonization of global spectrum allocation is stated goal of ALL sides in this proceeding

Comparison of WBFH Parameters

Parameter	WBFH (as proposed)		Europe (ETS 300 328)	WECA Compromise
Max. Channel Width	3 MHz	5 MHz	4 MHz	4 MHz
Tx Power Limit	200 mW (est.)	125 mW	100 mW (EIRP)	100 mW (EIRP)
Min. Hop Rate (Hz)	2.5 Hz	2.5 Hz	2.5 Hz	2.5 Hz
Min. # Hop Channels	25	15	20	20
ETSI Compatible?	No	No	Yes	Yes
Rx Performance Test?	No	No	No	Yes

THIS is Harmonization?



Comparison of ETSI FHSS Rules and Proposed WBFH Rules

Conclusions

- Intersil seeks to promote fair competition for broadband in the home and office

- Intersil seeks:

  meaningful protection for consumer investment in existing equipment

- What Intersil wants:
  - harmonization of US and European (ETSI) rules for FHSS (frequency hopping spread spectrum) systems