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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

10 July 2000

VIA HAND DELIVERY

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 7 July 2000, Eric Benhamou, CEO of 3Com Corporation, spoke with Commissioner Susan Ness about the above-captioned matter. Mr. Benhamou made the following points:

- (1) 3Com and its competitors – and their customers – have made substantial investments to develop and deploy high-speed wireless LAN's that comply with existing FCC Part 15 rules.
- (2) In this proceeding, the Commission is proposing changes to its Part 15 rules that would permit frequency-hopping systems to use wider bands at a high power level.
- (3) The proposed rule changes would permit harmful interference to high-speed wireless LAN's that comply with existing Part 15 rules – including those developed and deployed by 3Com and its many competitors.
- (4) The proposed rule changes would severely undermine the high-speed wireless LAN industry, and unfairly punish those competitors that have complied with the FCC's rules. It would degrade or destroy more than a billion of dollars of communications infrastructure.
- (5) ***For all their destructive potential, the wider-band systems envisioned under the proposed rules would create no new services for consumers.*** The proposed wider band systems would perform no better – and be no less expensive – than wireless LAN's built to the 802.11(b) IEEE standard that complies with the existing rules.

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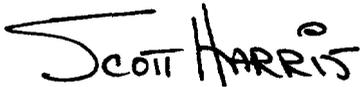
(6) These wider-band systems would also cause harmful interference to Bluetooth technology.

(7) 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.

(8) 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.

(9) The bottom line is that this proposal is a bad idea that will cause harmful interference to and slow market adoption of two important new technologies. This would hurt consumers and would not be in the public interest.

Respectfully submitted,

A handwritten signature in black ink that reads "SCOTT HARRIS". The signature is written in a cursive style with a large, sweeping initial "S" that extends to the left.

Scott Blake Harris

Counsel for 3Com Corporation