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July 10, 2000

BY HAND DELIVERY

Ms. Magalie R. Salas, Secretary
Federal Communications Commission
The Portals, 445 12th Street, S.W.
Washington, D.C. 20554

JUL 10 2000

99-231

Re: ET Docket ~~99-231~~
Amendment of Part 15 of the Commission's
Rules Regarding Spread Spectrum Devices
--- *Ex Parte Filing*

Dear Ms. Salas:

Proxim submits this brief response to address a fundamental inaccuracy in the recent *ex parte* filing of Intersil dated June 28, 2000, regarding the required span of hopping channels for devices that operate under the Commission's proposed wideband frequency hopping (WBFH) rules. In the filing, Intersil claims that Proxim introduced on March 23, 2000 "for the first time in this proceeding and without any technical support" the notion that WBFH devices be required to cover at least 75 MHz of bandwidth. Intersil further adds "adoption of such a new requirement would effectively nullify a specific provision in the current rules [Sec. 15.247 (h)] that helps ensure appropriate sharing of the unlicensed spectrum".

These assertions are completely false. As discussed below, the language suggested by Proxim makes no change whatsoever to the current rules. This language specifically addresses only WBFH devices and is prompted by the need to treat such devices consistently with narrowband devices under the rules.

The existing Part 15 rules governing FH devices explicitly require the use of at least 75 MHz of bandwidth using 75 distinct hopping channels when the channel bandwidth is equal to 1 MHz. Examples of such existing narrowband FH systems with 1 MHz channel bandwidth include Bluetooth, IEEE802.11FH, OpenAir and HomeRF. The Commission's initial proposal in ET Docket 99-231 was identical to these existing 1 MHz wide rules in this regard, except that the channel bandwidths could be increased up to 5 MHz. The existing 75-hop requirement, however, was retained and thus WBFH

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devices, along with virtually all existing narrowband frequency hopping devices, are required to span at least 75 MHz of bandwidth.

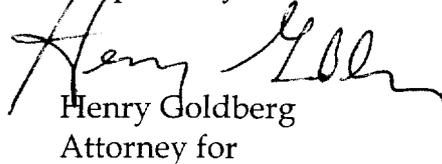
When Intersil and other opponents of the Commission's WBFH initiative complained that such partially overlapping channels were undesirable for them, Proxim and other HomeRF proponents compromised by agreeing to use non-overlapping channels instead. For purposes of clarification only, Proxim stated explicitly that a minimum total bandwidth of 75 MHz be used with these non-overlapping channels in order to be consistent with the Commission's original WBFH proposal and with the existing narrowband FH rules for 1 MHz wide channels.

The June 28th Intersil filing portrays this as a last minute rule change to the existing narrowband FH rules. Proxim's suggested language, re-submitted here as Attachment 1, explicitly leaves the existing narrowband FH rules completely unchanged, as indicated by the use of italics for new language.

Intersil also is mistaken when it invokes Section 15.247(h) as yet another reason to oppose a 75 MHz total bandwidth requirement for WBFH devices. Intersil asserts "a requirement that at least 75 MHz be covered would completely nullify the ability of FH devices to adapt their hopsets to avoid other users of the band." This assertion is true but applies today to every existing narrowband FH system with 1 MHz channel bandwidth (in other words, virtually every 2.4 GHz FH device deployed in the United States). Were the Commission to remove this requirement, it would be permitting future WBFH devices with channel bandwidths greater than 1 MHz to have more latitude for selective band occupancy than is currently provided for existing Part 15 users of the 2.4 GHz band.

The balance of the Intersil filing deals with an interference susceptibility problem for existing direct sequence (DS) devices such as IEEE802.11b to existing narrowband FH devices, such as Bluetooth. There is, however, no relationship whatsoever between this issue and the issues under consideration in the present proceeding. Changing the rules for existing narrowband FH devices never has been within the scope of ET Docket 99-231. Proxim urges the Commission to finish its WBFH initiative without further delay before considering additional proposals to change the Part 15 frequency hopping rules.

Respectfully submitted,



Henry Goldberg
Attorney for
Proxim, Inc.

Attachment 1

ATTACHMENT 1

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.*