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* NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETH, P.L.C.

ATTORNEYS AT LAW

11th FLOOR, 1300 NORTH 17th STREET

ARLINGTON, VIRGINIA 22209-3801

(703) 812-0400

TELECOPIER

(703) 812-0486

INTERNET

www.fhh-telcomlaw.com

RETIRED MEMBERS
RICHARD HILDRETH
GEORGE PETRUTSAS
CONSULTANT FOR INTERNATIONAL AND
INTERGOVERNMENTAL AFFAIRS
SHELDON J. KRYS
U. S. AMBASSADOR (ret.)

OF COUNSEL
EDWARD A. CAINE*
DONALD J. EVANS*
MITCHELL LAZARUS
EDWARD S. O'NEILL*

WRITER'S DIRECT

703-812-0440

lazarus@fhh-telcomlaw.com

July 12, 2000

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Magalie R. Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

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

Dear Ms. Salas:

Pursuant to Section 1.1206(b)(1) of the Commission's Rules, on behalf of the Wireless Ethernet Compatibility Alliance (WECA), I am filing the original and one copy of this written ex parte communication in the above-referenced proceeding. WECA is an association of product vendors that certifies products for interoperability with the IEEE 802.11 spread spectrum wireless LAN standard.

WECA wishes to place in the docket the enclosed news article titled, "Proxim to support rival wireless standard."¹

WECA opposes the HomeRF proposal for wideband frequency hopping systems on the ground that these systems would cause undue interference to existing direct sequence and frequency hopping systems.

Proxim is a leading proponent of HomeRF. The article announces Proxim's support of IEEE 802.11b, a high-speed direct sequence standard used by members of WECA and many other opponents of the HomeRF proposal.

¹ Source: <http://news.cnet.com/news/0-1004-200-2234565.html?tag=st.ne.1002.5&st.n>

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Magalie R. Salas, Esq.
July 12, 2000
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WECA is pleased that Proxim will market products that comply with the 802.11 standard, and believes its participation will benefit the industry. At the same time, however, the attached article shows that HomeRF members are free to manufacture high-speed direct sequence systems free of patent and other barriers, and thus to deliver their proposed services without increasing interference in the band.

Kindly date-stamp and return the extra copy of this letter.

If there are any questions about this filing, please call me at the number above.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mitchell Lazarus", with a long horizontal flourish extending to the right.

Mitchell Lazarus
Counsel for the
Wireless Ethernet Compatibility Alliance

ML:deb

Enclosure

cc: Service List



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Proxim to support rival wireless standard

By Wylie Wong
Staff Writer, CNET News.com
July 10, 2000, 10:55 a.m. PT

Wireless company Proxim Technologies is subscribing to the old axiom: If you can't beat them, join them.

Proxim, which sells a popular line of wireless networking kits to consumers and businesses, has historically built its technology using its own proprietary wireless standard. Now the firm plans to support a faster wireless standard supported by rivals 3Com, Cisco Systems, Lucent Technologies and others.

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Proxim today announced new wireless networking kits for businesses, schools, hospitals and other workplaces that allow people with laptops to move around while staying connected to the Internet and corporate network. A Proxim executive said new products will support Proxim's own proprietary Open Air wireless standard, the current industry standard called 802.11B that is five times faster, and other forthcoming wireless standards that will be even faster.

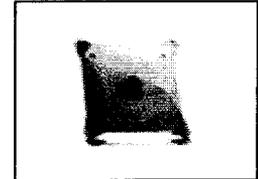
Yankee Group analyst Karuna Uppal said it is vital for Proxim to support the new, faster industry standard, and that its plan to make products compatible to all current and future standards is a smart move.

"They have to continue to support their own Open Air standard because they have a big installed base in businesses and can't leave them hanging," Uppal said. "And they have to support 802.11B because it's an industry standard and it's gaining momentum."

Proxim competes in a market expected to grow from \$471 million in 1999 to \$2.2 billion in 2004, according to market researcher Cahners In-Stat Group. And nearly every networking firm, including Cabletron Systems, is supporting the 802.11B standard, which runs at 11 megabits-per-second.

"The biggest feedback we got from our customers was, 'help us deal with multiple standards out there,'" said Lynn Chroust, Proxim's director of product marketing. "This allows them to make transitions (to different wireless standards) in the least disruptive way."

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Proxim plans to ship its new family of wireless networking products, called Harmony, in October. The kits include notebook PC cards that have radio transmitters and receivers built in and hardware called "access points" that are affixed to ceilings or walls and wirelessly link computers to an Internet connection.

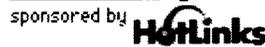
Chroust said Proxim has created a new piece of hardware, or "access point," that ties both the Proxim Open Air and the 802.11B wireless standards together, allowing them to communicate. Businesses that currently use Proxim's older networking kits can support the new 802.11B standard without having to replace their existing technology, she said.

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445 12th Street, S.W.
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Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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Legal Advisor
Office of Commissioner Powell
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Mark Schneider
Legal Advisor
Office of Commissioner Ness
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Adam Krinsky
Legal Advisor
Office of Commissioner Tristani
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dale Hatfield, Bureau Chief
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, S.W., Room 7C-155
Washington, D.C. 20554

Michael J. Marcus
Associate Chief, Technology
Office of Engineering & Technology
Federal Communications Commission
445 12th Street, S.W., Room 7-C140
Washington, D.C. 20554

Julius Knapp, Chief
Policy & Rules Division
Federal Communications Commission
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Washington, D.C. 20554

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Technical Rules Branch
Federal Communications Commission
445 12th Street, S.W., Room 7A-161
Washington, D.C. 20554

Neal McNeil
Electronics Engineer
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, S.W., Room 7A-133
Washington, D.C. 20554

John A. Reed
Senior Engineer
Technical Rules Branch
Federal Communications Commission
445 12th Street, S.W., Room 7-A140
Washington, D.C. 20554