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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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EX PARTE OR LATE FILED

19 July 2000

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

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

Dear Ms. Salas:

On 18 July 2000, Eric Benhamou, CEO of 3Com Corporation, spoke with Chairman William E. Kennard about the above-captioned matter. Mr. Benhamou made the following points:

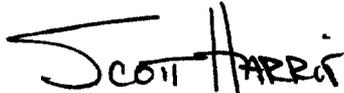
- (1) 3Com and its competitors – and their customers – have made substantial investments to develop and deploy high-speed wireless LAN's that comply with existing FCC rules.
- (2) In this proceeding, the Commission is proposing changes to its Part 15 rules that would permit frequency-hopping systems to use wider bands at a high power level.
- (3) The proposed rule changes would permit harmful interference to virtually all spread spectrum systems that comply with existing 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 have no better performance capabilities – and be no

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less expensive – than systems available under the 802.11(b) IEEE standard that complies with the existing rules.

- (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. Nothing has changed since then.
- (9) The bottom line is that this proposal is a bad idea that will cause harmful interference to and slow market adoption of two key 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 stylized with a large, sweeping initial "S" and a distinct "H".

Scott Blake Harris  
Counsel for 3Com Corporation

cc: William E. Kennard