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February 28, 2001

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie R. Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: ET Docket 99-231  
*Ex Parte*

Dear Ms. Salas:

On February 16, 2001, Intersil Corporation ("Intersil") filed an *ex parte* letter in this proceeding in response to an earlier letter from Texas Instruments. The purpose of the Intersil letter, apparently is to compare the relative merits of Complimentary Code Keying ("CCK") and Packet Binary Convolutional Coded systems. It should be noted that, in its letter, Intersil all-but-concedes that CCK systems do not, in fact, comply with the processing gain requirement for direct sequence spread spectrum ("DSSS") systems set forth in Section 15.247(e) of the Commission's rules.

Under Section 15.247(e), the processing gain of a DSSS system must be at least 10 dB. The Intersil CCK system, Intersil notes, has a spreading gain of only 9 dB; it achieves an additional 2 dB of gain through coding. "Processing gain" as it is used in the Commission's rules and in industry practice has always been defined by the system's spreading gain.<sup>1</sup> Coding gain, to the extent there is any, traditionally has been calculated separately. Indeed, Intersil itself goes on to note that "coding gain" and "processing gain" are not synonymous, and that "coding gain does not necessarily translate into interference immunity."

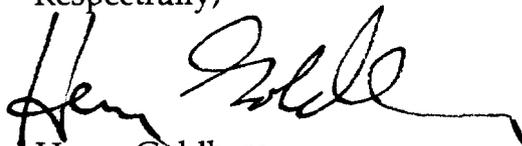
<sup>1</sup> "The processing gain represents the improvement to the received signal-to-noise ratio, after filtering to the information bandwidth, from the spreading/despreading function." 15.247(e).

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The purpose of this letter is not to focus on CCK system compliance, but rather to reiterate the need for the Commission to enforce the spreading requirement when it is considering requests for certification of DSSS technologies.

Respectfully,

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

Henry Goldberg  
Attorney for Proxim, Inc.

cc: Julius Knapp  
Karen Rackley  
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