

April 12, 2002

Mr. William F. Caton, Acting Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

*Re: Notice of Ex Parte Communications
ET Docket No. 98-42; ET Docket No. 99-231; ET Docket 01-278*

Dear Mr. Caton:

On April 11th and 12th, 2002, representatives of the Bluetooth SIG (Bluetooth) had several meetings regarding issues in the above-noted proceedings with FCC Commissioners and staff.

These meetings were with: (1) Commissioner Martin and his legal advisor, Sam Feder; (2) Commissioner Copps and his senior legal advisor, Jordan Goldstein; (3) Peter Tenhula, senior legal advisor to Chairman Powell; (4) Bryan Tramont, senior legal advisor to Commissioner Abernathy; and (5) Ed Thomas, Julie Knapp, Geraldine Matise, Ira Keltz, Karen Rackley, and Neal McNeil of OET.

The Bluetooth representatives in all of these meetings were: Jeff Schiffer of Intel Corporation, Skip Bryan of Ericsson, Inc., David Hytha of Silicon Wave, Inc., Carl Stevenson of Agere Systems, Inc., and undersigned counsel. In addition: Rob Kubik of Motorola, Inc. participated in the meeting with OET; James Blackwell of Cambridge Silicon Radio participated in the meetings with OET, Mr. Tenhula, and Mr. Tramont; and Leo Fitzsimon of Nokia Corporation participated in the meeting with Mr. Tramont.

In each of these meetings, the Bluetooth representatives made the following points:

(1) In the past year, Bluetooth technology has begun to deliver on its vast promise. Between 10 and 20 million Bluetooth units were sold in the last half of 2001, and sales could double in 2002. It will not be long before Bluetooth technology is incorporated in hundreds of millions of mobile phones, PDAs, laptops, and other consumer devices. Moreover, the explosion in the use of unlicensed devices by consumers and businesses has not caused harmful interference. Indeed, technological advances are improving the interference environment even as use of the unlicensed bands increases. And, as noted below, with several minor rule changes, the Commission can help improve the interference environment even further.

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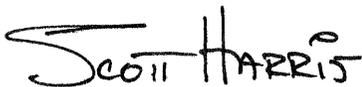
(2) If the Commission changes its rules to permit the commercial deployment of RF lighting technology, it must do so in a way that does not effectively prevent Bluetooth and other unlicensed technologies from using two-thirds of the 2.4 GHz band. This means that RF lighting technology must be subject to in-band emission limits, such that its high power RF pollution is limited to the top 1/3 or less of the 2.4 GHz band. If it cannot meet these standards, its commercial deployment should not be permitted.

(3) The Commission should adopt its proposal permitting reduced hopsets for FHSS devices in the 2.4 GHz band, and should mandate that devices that take advantage of such reduced hopsets use adaptive hopping algorithms. The adoption of these rule changes will permit increased use of the 2.4 GHz band with even fewer interference concerns than exist today.

(4) The Commission's rules, and their implementation by the Lab, should permit coordinated hopping between RF transmitters contained within a single device (such as a laptop). The Commission's rules should also permit coordinated hopping between transmitters in different devices, except that devices that use such hopping to monopolize the band should still be prohibited. These changes, too, would reduce potential interference in the 2.4 GHz band, and allowed for the continued robust growth in unlicensed devices and services.

(5) The requests made by SDARS operators to impose new limits on unlicensed devices in the 2.4 GHz band should be rejected. These requests were virtually devoid of technical analysis, and the analysis that was presented is frivolous.

Respectfully submitted,

A handwritten signature in black ink that reads "SCOTT HARRIS". The signature is written in a cursive style with a large, stylized 'S' at the beginning.

Scott Blake Harris

cc: meeting participants