



April 25, 2002

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: Amendment of Part 15 of the Commission's Rules Regarding Spread Spectrum Devices, ET Dkt. No. 99-231.

Notice of Oral Ex Parte Presentation

Dear Ms. Dortch:

On Wednesday, April 24, 2002, Al Bettner, Ghery Pettit and Peter Pitsch of Intel spoke with the following from the Commission's Office of Engineering and Technology: Bruce Franca, Deputy Chief; Ira Keltz, Acting Deputy Chief, Policy and Rules Division; Karen Rackley, Chief, Technical Rules Branch; and Neal McNeil regarding the Baniya Coexistence System as it relates to Section 15.247 of the Commission's Rules.

The Intel representatives described the Baniya Coexistence System, why it meets the letter and spirit of the present Rules (Part 15.247) and in any event why the above referenced rulemaking could and should expeditiously make clear that systems such as the Baniya Coexistence System are permitted.

In the course of the discussion the following points were made:

- The Baniya mobile platform uses a hardware handshaking technique that allows an IEEE 802.11b module and a Bluetooth module to coexist in a single product.
- Without changing the pseudorandom frequency selection algorithm, dwell times, power or frequencies, the Baniya system suppresses the Bluetooth transmission when the Bluetooth module would hop to a frequency falling in the pass band of the IEEE 802.11b receiver when it is actively receiving a signal.

- If the IEEE 802.11b receiver is not in a receive priority state the Bluetooth module is allowed to transmit on that frequency.
- Baniias does not change the frequency selection algorithm, so all channels are still equally selected on average, thereby meeting the requirements of 15.247(a)(1).
- The dwell time on each frequency is not changed, so the requirement in 15.247(a)(1)(ii) that each frequency not be used more than 0.4 seconds in a 30 second window is met.
- The Baniias Coexistence System is employing intelligence to avoid transmitting on an occupied channel, as allowed in 15.247(h) of the Rules.
- The overall effect of the Baniias Coexistence System is to reduce the throughput of the Bluetooth link and to reduce overall RF emissions, thus reducing the interference potential of the Bluetooth module.
- The user of the Bluetooth system will bear the impact of the reduced data rate and other users of the spectrum will benefit from the overall lower RF emissions.

Pursuant to Section 1.1206(b) of the Commission's Rules, an original and one copy of this letter are being submitted to the Secretary's Office and a copy is being provided to each of the above referenced FCC personnel. Please inform me if any questions should arise in connection with this filing.

Respectfully submitted,

/s/ Peter K. Pitsch

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