

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Part 15 of the Commission's	)	ET Docket No. 98-156
Rules to Allow Certification of	)	
Equipment in the 24.05 to 24.25 GHz Band	)	
At Field Strengths up to 2500 mV/m	)	
	)	
To: The Commission	)	

**REQUEST FOR EXTENSION OF TIME**

On or about April 24, 2002, the Commission placed on Public Notice (“the Notice”) a Petition for Reconsideration in the above-captioned proceeding (“the Petition”), filed on February 13, 2002 by the American Radio Relay League (“ARRL”). Subsequently, the Notice was published in the Federal Register, establishing a closing date for filing comments in support of, or in opposition to, the Petition of May 15, 2002 and a closing date for filing replies of May 27, 2002.

On behalf of the three wireless working groups (the “IEEE 802 WWGs”)<sup>1</sup> in IEEE Project 802<sup>2</sup>, the IEEE 802.18 Radio Regulatory Technical Advisory Group hereby respectfully requests an extension of the aforementioned filing deadlines to May 31, 2002 and June 28, 2002, respectively, in order to afford IEEE 802.18, the IEEE 802 WWGs, and the IEEE 802 Sponsor Executive Committee (“SEC”) an opportunity to consider the issues raised in the Petition and prepare and approve their collective comments for filing with the Commission.

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<sup>1</sup> The 802.11 Wireless Local Area Network Working Group, the 802.15 Wireless Personal Area Network Working Group, and the 802.16 Wireless Metropolitan Area Network Working Group

<sup>2</sup> The IEEE Local and Metropolitan Area Networks Standards Committee (“IEEE 802” or the “LMSC”)

The IEEE 802 WWGs, their hundreds of members, and the companies that sponsor those members' participation in the IEEE 802 standards process are interested parties in this proceeding for two principal reasons:

1) In the Petition, the ARRL broadly challenges the Commission's fundamental authority to authorize Part 15 operations on the basis that they *might possibly* cause interference to amateur communications.

2) Many of the Part 15 bands, including the 2.4 GHz and 5 GHz bands that are widely utilized by a plethora of devices based on a number of IEEE 802 standards<sup>3</sup>, are shared with the Amateur Radio Service.

Together, these factors raise issues that we feel obligated to thoroughly review and address, not only on behalf of our members, but also on behalf of the literally millions of users of Part 15 devices based on IEEE 802 standards.

Unfortunately, the current timing of the filing deadlines, relative to the mid-May, 2002 meeting schedules of IEEE 802.18 and the IEEE 802 WWGs renders it impossible for us to respond by the currently established filing deadlines.<sup>4</sup>

We believe that the public interest would be served by extending the deadlines by the modest amounts requested, to provide the IEEE 802 WWGs the opportunity to participate in this proceeding, and furthermore that the modest delay in the proceeding that would be caused by such an extension of the filing deadlines will not cause any demonstrable hardship to the Petitioner.

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<sup>3</sup> The IEEE 802.11a, 802.11b, 802.15.1, 802.15.3, 802.15.4, and 802.16 standards all currently use, or are targeted to soon use, either the 2.4 GHz or 5 GHz Part 15 bands.

<sup>4</sup> (Based on the requirement that 802.18 first draft and then gain the approval of a proposed filing by the three IEEE WWGs, followed by the approval of the IEEE 802 Sponsor Executive Committee ("SEC"), with SEC approval requiring a minimum of a five (5) day review period for external position statements that are reviewed by e-mail circulation ... a process that will be necessary to meet even the requested extended deadlines.)

Therefore, in summary, the IEEE 802.18 Radio Regulatory Technical Advisory Group respectfully requests that the Commission grant an extension of the closing date for filing comments in support of, or in opposition to, the Petition from the current date of May 15, 2002 to May 31, 2002 and an extension of the closing date for filing replies from the current date of May 27, 2002 to June 28, 2002.

Respectfully submitted,

/s/

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## Certificate of Service

I, the undersigned, hereby certify that on May 7, 2002 I served, by delivery to the US Postal Service, true and complete copies of the attached Request for Extension of Time in ET Docket No. 98-156, to the following persons or entities as required by the Commission's rules:

Christopher D. Imlay  
ARRL General Counsel  
Booth, Freret, Imlay, & Tepper, P.C.  
5101 Wisconsin Ave., N.W., Suite 307  
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/s/

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