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ATTORNEYS AT LAW

8 May 2002

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington DC 20554

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

Dear Ms. Dortch:

On 7 May 2002, undersigned counsel, representing the Bluetooth SIG (Bluetooth), discussed certain issues in the above-noted proceeding with Paul Margie, legal advisor to Commissioner Copps.

Specifically, counsel urged the Commission to adopt its proposal permitting reduced hopsets for FHSS devices in the 2.4 GHz band *and* to mandate that devices taking 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. Counsel also argued that simply reducing permitted power levels for devices using reduced hopsets would not allow industry and consumers to benefit fully from a reduced interference environment.

Counsel also suggested that the Commission should take this opportunity to permit coordinated hopping between RF transmitters contained within a single device (such as a laptop) -- or to make clear that coordinated hopping between RF transmitters contained within a single device is permitted under current rules.

Finally, counsel suggested that the Commission should indicate that, in the future, it may permit coordinated hopping between transmitters in different devices -- provided that it can, by rule, identify and prohibit devices that use such hopping to monopolize the band.

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" and "H".

Scott Blake Harris

cc: Paul Margie