Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Parts 2 and 97 of the	)	ET Docket No. 02-98
Commission's Rules to Create a Low Frequency	)	RM-9404
allocation for the Amateur Radio Service	)	
	)	
Amendment of Parts 2 and 97 of the	)	
Commission's Rules Regarding an Allocation of a	)	RM-10209
Band near 5 MHz for the Amateur Radio Service	)	
	)	
Amendment of Parts 2 and 97 of the	)	
Commission's Rules Concerning the Use	)	RM-9949
Of the 2400-2402 MHz Band by the	)	
Amateur and Amateur-Satellite Services	)	

To: The Commission

COMMENTS OF INTELLON CORPORATION

Intellon Corporation submits these comments in response to the Commission's Notice of Proposed Rulemaking in the above-captioned proceeding. Herein we address only the proposed allocation of a new 5 MHz band to the radio amateur service. Intellon Corporation respectfully requests that home consumer devices meeting current Part 15 standards continue to be permitted to operate in the 5 MHz spectrum for a period of at least ten years from the date of any new allocation to the radio amateur service.

INTRODUCTION

Intellon is a leader in powerline communications technologies and the developer of the technology selected by the HomePlug Powerline Alliance. We are a fabless semiconductor company and provide integrated circuit solutions to original equipment manufactures (OEMs) such as Linksys, Netgear, Phonex and others. Intellon currently manufactures a two chip set solution for powerline networking (INT5130 and INT1000) and has recently introduced a new single chip solution (INT51x1), which significantly reduces the total cost to OEMs. Our integrated circuits provide reliable, low cost 14 Mbps networking for home and small business environments. Intellon is currently developing

an advanced powerline networking technology that will provide data rates of up to 150 Mbps, enabling the networking of both High Definition Television (HDTV) and Standard Definition Television (SDTV) signals within a home.

DISCUSSION

All of our products conform to the HomePlug standard and are certified to comply with all FCC rules and regulations. Market analysts predict that the demand for networking products such as ours will greatly expand over the next few years. These products allow consumers to connect together their computers, printers, MP3 audio players, Internet access device and other digital devices without having to tear into ceilings and walls to install networking wires.

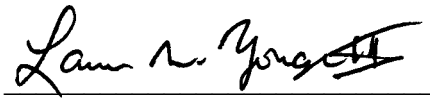
In its separate comments, the HomePlug Alliance explains that the current standard specifies notching out certain amateur frequencies bands between 4 and 21 MHz. Without these additional notch filters, there is little chance of interference with amateur operations. However, to make interference even less likely, the notching was added to the specification. We therefore do not believe that the allocation of the new 5 MHz amateur radio band will increase interference complaints in any substantial manner. Nevertheless, consumers and companies would be put at a disadvantage were such complaints to arise. Obviously the potential for such complaints was not possible to foresee when our products were designed.

If the new 5 MHz spectrum is allocated for radio amateur use, it will likely be some years before new equipment operating in the band is available. Once the equipment is available, history has shown that the use of the new band by amateurs will gradually increase over a number of years. Therefore, to prevent unnecessary difficulty, we respectfully request that if a new 5 MHz band is allocated for amateur use, that the Commission permit HomePlug-compliant devices to operate free from amateur interference complaints in the 5 MHz band for a period of ten years. This would prevent unnecessary harm to device manufacturers and consumers. During this period we expect that the HomePlug Alliance, in cooperation with individual companies, will work with radio amateurs to examine any interference potential and, if deemed necessary, make any modifications necessary to the current standard.

CONCLUSION

Many companies are either in production or are in the final stages of product design for HomePlug standard powerline products. As the market for the new technology grows, it will provide benefits to consumers including networking of home PCs, access to the Internet and new kinds of home entertainment products. Because the likelihood of interference is small and great care has been taken to keep existing amateur bands interference-free, Intellon respectively requests the Commission to allow the current HomePlug standard technologies to continue to operate unmodified for a period of 10 years from the date of the spectrum reallocation.

Respectfully submitted,



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