



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

In the Matters of
Unlicensed Operation in the TV Broadcast Bands

ET No. 04-186

Additional Spectrum for Unlicensed Devices
Below 900 MHz and in the 3 GHz Band

ET No. 02-380

Via the ECFS

Comments of the Wi-Fi Alliance

Since 1999, the Wi-Fi Alliance (WFA), an international non-profit organization has been promoting and certifying the interoperability of IEEE 802.11-based wireless products. The WFA has grown from its original five member companies to more than 300 in 2006. Over 3240 products have been Wi-Fi Certified™ and over 200 million chipsets have been shipped. The WFA promotes the use of interoperable advanced wireless devices and fosters their continued development and deployment – all of which benefit governments, industry, and consumers around the world. With 802.11 having emerged as the leading standard for broadband wireless access (BWA) in client devices globally, and with Wi-Fi technology rapidly evolving to meet changing customer needs, the WFA supports opportunities to make additional spectrum available for 802.11 and other innovative technologies.

The propagation characteristics of the spectrum discussed in this NPRM could result in Wireless Local Area Network (WLAN) -type systems capable of increased coverage, operation at lower power and/or providing higher throughput. The availability of spectrum with these favorable characteristics would undoubtedly encourage the continued and rapid development of technologies with functionality that would meet the future regulatory constraints on the use of white spaces in this band.

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The purpose of the recent NPRM and related FCC activities is to resolve outstanding issues before the completion of the DTV transition. The conditions for sharing this spectrum with the incumbents and the associated regulatory criteria are of keen interest to the WFA member companies and we look forward to new developments as we get closer to the February 2009 conversion date.

As that process unfolds, the WFA would like to ensure that the door remains open for consideration of the use of non-interfering, unlicensed devices such as 802.11 in the TV bands. We are aware that the characterization of DTV receivers announced to be available by March 2007 will be a major factor in the determination of the rules for shared operation in the TV bands. However, given suitable sharing rules, we anticipate there will be sufficient technology advances to enable unlicensed devices to share the TV bands with the primary users in those bands.

The WFA thanks the FCC for its leadership role in considering more efficient use of spectrum in the TV bands. Recognizing that TV band re-farming is on many regulatory agendas, the WFA has a strong desire to work with the FCC, the ECC, the ITU-R and international standards developing organizations like the IEEE 802 and ETSI towards a harmonized spectrum sharing regime that will benefit users and the Wi-Fi industry world-wide.



Conclusion

The WFA looks forward to new spectrum opportunities for the deployment of Wi-Fi technology. We believe, given the excellent track record of the Wi-Fi industry to develop cost-effective solutions, and given spectrum sharing rules that allow for commercially beneficial solutions, 802.11 technology will evolve to meet spectrum sharing challenges. Finally, Wi-Fi technology is used world-wide and there is a strong interest among the WFA membership in harmonized radio regulations. Therefore we encourage the FCC to coordinate its rule making for TV band sharing with other major players on the international stage.

Sincerely,

James Raab
WFA Regulatory Task Group Chair