

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

In the Matter of

PETITION FOR RULEMAKING BY STARKEY      RM-11523  
LABORATORIES, INC., TO AMEND THE  
MINIMUM BANDWIDTH REQUIREMENTS IN  
SECTION 15.247(a)(2) FOR THE 902-928 MHz  
BAND

**Via the ECFS**

**COMMENTS OF IEEE 802.18**

IEEE 802.18, the Radio Regulatory Technical Advisory Group (“the RR-TAG”) within IEEE 802<sup>1</sup> hereby submits its Comments in the above-captioned Proceeding. This document was prepared and approved by the RR-TAG, and also was reviewed by the IEEE 802 Executive Committee.<sup>2</sup>

The members of the RR-TAG that participate in the IEEE 802 standards process are interested parties in this proceeding. We appreciate the opportunity to provide these comments to the Commission.

**INTRODUCTION**

1. On April 11, 2008, Starkey Laboratories, Inc., (“Starkey”) filed a petition for rulemaking with the Federal Communications Commission requesting that Part 15.247(a)(2) of the Commission’s rules be amended to allow digital modulations with 6 dB transmission bandwidths less than the currently required 500 kHz. Starkey’s proposal is that the minimum 6 dB bandwidth allowed for digital modulations be reduced to 100 kHz.

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<sup>1</sup> The IEEE Local and Metropolitan Area Networks Standards Committee (“IEEE 802” or the “LMSC”)

<sup>2</sup> This document represents the views of IEEE 802.18. It does not necessarily represent the views of the IEEE as a whole or the IEEE Standards Association as a whole.

2. In addition, with respect to Part 15.247(a)(3), Starkey proposes that the maximum peak conducted output power for transmissions using digital modulations with bandwidths less than 500 kHz be limited by the 8 dBm/3 kHz rule in Part 15.247(e).

**IEEE 802.18 RECOMMENDS THAT THE FCC AMEND PART 15.247 TO  
INCORPORATE THE CHANGES PROPOSED BY STARKEY**

3. IEEE 802.18 agrees with Starkey's view that this rule change would permit assistive listening devices ("ALDs") using digital modulation to operate more efficiently in terms of both battery drain and occupied spectrum, while potentially offering better user experiences for the hearing impaired public.
4. IEEE 802.18 also believes that other applications, for example battery operated or energy scavenging sensor networks used in homes, offices, and industrial buildings, would benefit from this change in the rules, since these networks often operate at lower data rates, and could also operate more efficiently, in terms of reduced battery drain and reduced spectrum occupancy, if lower transmission bandwidths are allowed under Part 15.247.
5. In our view, the changes proposed by Starkey serve the public interest in the specific instance of promoting new assistive listening technology for the hearing impaired, and also serve to promote the development and application of new technology in sensor networks and in other technology arenas where lower data rates and longer battery life are important parameters.

**CONCLUSION**

6. IEEE 802.18 recommends that the Commission accept the rules proposed by Starkey Laboratories, Inc.

Respectfully submitted,

/s/

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