

In paragraph 21, the Commission states: “*We invite comment as to the state of deployment of broadband services that are offered under our rules for unlicensed devices.*” IEEE 802.18 believes that in the 24 years since the Commission issued Part 15.247, the 802.11 WLAN standard has created an industry, and enabled low-cost, untethered Internet access and wireless networking for tens of millions of users in the United States, at home, in their offices and at hundreds of thousands of hot spots in all sorts of venues, in every corner of the country. And based on this success we expect the WRAN services with their extended coverage capabilities and other TV White Space devices to flourish as this technology rolls out over the course of the next several years. As such, we encourage the Commission to continue in this direction.

In paragraph 43, the Commission seeks “*...comment on how different regulatory approaches that the Commission has adopted in the past, such as facilitating more efficient spectrum use, developing licensing rules and construction requirements, designating spectrum for licensed versus license-exempt use, secondary markets, cognitive radio, or other polices can ensure efficient and effective access to broadband.*” This group has followed with interest, the many efforts of the Commission to enable additional spectrum for unlicensed use. Sharing of the 5GHz spectrum has enabled the WLAN industry to increase the available non-overlapping channels from 3 (in the 2.4GHz band) to 34. In recent proceedings the Commission has enabled sharing via cognitive access of the 3650 to 3700MHz band, and sharing of the TV bands with geolocation database and sensing requirements,. Each of these Commission rulings has resulted in the development of an IEEE 802 standard that takes advantage of the unlicensed spectrum made available. We expect these new wireless standards to open up new access opportunities, especially in underserved lower population rural areas through

the use of lower frequency bands resulting in improved extent of coverage due to inherently better RF signal propagation, much as the Commission describes in this NOI.

CONCLUSION

We recognize that this NOI represents only a starting point for a long-term evolutionary process, and we expect that our comments in this proceeding are also just a start to a long-term collaboration with the Commission on issues involving wireless networking as it pertains to this nationwide broadband access plan. We thank you for allowing us to be a part of this undertaking.

Respectfully submitted,

/s/

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