

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

In the Matter of

Wireless Telecommunications Bureau Seeks
Comment on Spectrum Needs for the
Implementation of the Positive Train Control
Provisions of the Rail Safety Improvement Act of
2008

WT Docket No. 11-79

Via the ECFS

COMMENTS OF IEEE 802

1. IEEE 802¹ respectfully submits its Comments in the above-captioned Proceeding².
2. IEEE 802, as a leading consensus-based industry standards body, produces standards for wireless networking devices, including wireless local area networks (“WLANs”), wireless personal area networks (“WPANs”), wireless metropolitan area networks (“Wireless MANs”), and wireless regional area networks (“WRANS”). Included in our standards development activity is an emphasis on coexistence, which is the focus of our Wireless Coexistence working group. We appreciate the opportunity to provide these comments to the FCC.

INTRODUCTION

3. On May 5, 2011 the Commission opened the above-captioned proceeding, setting June 20, 2011 as the closing date for comments, and July 11, 2011 as the closing date for reply comments.
4. Recently, an Interest Group on Positive Train Control (“IGptc”) has been formed in the IEEE 802.15 Working Group (“802.15”) to review the technology approaches and issues

¹ The IEEE Local and Metropolitan Area Networks Standards Committee (“IEEE 802” or the “LMSC”).

² This document represents the views of IEEE 802. It does not necessarily represent the views of the IEEE as a whole or the IEEE Standards Association as a whole.

related to the development of a future standard for the wireless data link element of Positive Train Control (“PTC”) systems. Efforts are being made by IGptc to invite participation from the broad rail transportation communications industry.

5. IEEE 802 is interested in following the work of the Commission in working through the issues related to this proceeding, and possible subsequent proceedings, related to PTC spectrum. We do not have specific recommendations regarding suitable spectrum for PTC at this time.

CONCLUSION

1. IEEE 802 realizes the potential importance of PTC technology to improving the safety of rail operations and applauds the Commission’s work in addressing the PTC spectrum allocation issues.

Respectfully submitted,

/s/

Michael Lynch
Chair, IEEE 802.18 Radio Regulatory Technical Advisory Group
108 Brentwood Court
Allen, TX 75013
972.814.4901
freqmgr@ieee.org