

May 28, 2013

Dr. Rashmi Doshi
Chief, Laboratory Division
Office of Engineering and Technology
Federal Communications Commission
Washington, D.C, 20554

Re: Proceeding Number 13-49, Revision of Part 15 of the Commission's Rules to Permit
Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band

Dear Dr. Doshi,

Ruckus Wireless, Inc. ("Ruckus") is global supplier of carrier-class Wi-Fi products and technologies for mobile Internet infrastructure and enterprise wireless LAN ("WLAN") systems. Ruckus provides both advanced indoor and outdoor wireless systems for service provider and enterprise customers to support applications such as WLAN access, mobile data offload, public access, and WLAN services.

Ruckus notes that the 80MHz spectrum at 2.4GHz suffers from a number of limitations and is becoming increasingly ineffective or even unusable in public spaces, urban deployments, and other high-density applications.

Ruckus supports efforts to both broaden the available 5GHz spectrum for use with unlicensed Wi-Fi services and to harmonize the rules between U-NII bands. Ruckus believes that such efforts are particularly important to address now as pressure on the current 5GHz spectrum allocation will rapidly increase from the adoption of 802.11ac technology and the proliferation of 802.11ac compliant devices.

Ruckus acknowledges and supports the efforts of the Commission in this critical area and currently plans to submit more comprehensive comments during the reply period.

Sincerely,



Steve Martin
Senior Vice President of Engineering