

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

In the Matter of

Petition for Rulemaking of the Wireless
Ethernet Compatibility Alliance To Permit
Unlicensed National Information Infrastructure
Devices To Operate in the 5.470-5.725 GHz
Band

RM-10371

To: The Commission

COMMENTS OF INTERSIL CORPORATION

Intersil Corporation hereby submits comments in support of the captioned proceeding and encourages the Federal Communications Commission (“Commission” or “FCC”) to approve the Petition to allocate the 5.470-5.725 GHz band for use by radio local area network (“RLAN”) and other unlicensed service devices.

WECA’s petition would allow for the development of lower cost RLAN devices that are able to more effectively compete in a global marketplace. Intersil Corporation is a manufacturer of integrated circuit technology for RLAN products in the 2.4 GHz and 5 GHz bands. The WECA petition would more closely align the rules governing the operation of devices in the 5 GHz band with those currently in place in the European community. This alignment would allow Intersil and its customers to develop a single product type that could operate without modification across a broad global marketplace. This in turn would allow higher performance, lower cost products that can compete more effectively both domestically and abroad benefiting the public and consumers. Uniform rules will reduce the cost of exported products, and hence

will support the domestic economy by helping to maintain U.S. dominance in unlicensed wireless communications.

Additionally, the WECA petition provides additional bandwidth to address the coming need for information infrastructure capable of supporting multi-media rich applications. There is a continuous demand for greater bandwidth and higher data rates from networking technologies. This is expected to hold true for wireless networking technologies, which in addition to data distribution, are expected to provide for wire-free distribution of high resolution video around the home or workplace. Wireless networking technologies have already provided great benefit to consumers and businesses by enabling mobility and increasing productivity. The additional bandwidth from 5.470 to 5.725 GHz would allow for a greater number of co-located applications to be supported on a non-interfering basis or for the development of new technologies providing even higher data rates than the 54 Mbps provided by today's 802.11a standard.

Intersil also agrees that the expected applications for devices operating in the 5.470 to 5.725 GHz band are likely to be very similar to those in the 5.25 to 5.35 GHz band. As such, the current rules applied to the U-NII band from 5.25 to 5.35 GHz should be extended to the 5.470 to 5.725 GHz band. The current rules applied to the band from 5.15 to 5.25 GHz are restricted to lower power operation and limited to indoor use only in order to protect sensitive satellite feeder links from potential interference. These same concerns do not exist in the requested band. The current U-NII rules for the upper band from 5.7125 to 5.8125 provide higher power levels and are intended to support the operation of point to point links. Again, this application is different from the expected application of devices operating in the requested band. Intersil agrees that the current U-NII rules for 5.25 to 5.35 GHz strike a good balance and are well suited to applications in the 5.470-5.725 GHz band.

Protection of other users. Intersil acknowledges the need to craft rules that will afford full protection to incumbent users. We note particularly that part of the spectrum at issue may have implications for air safety. Terminal Doppler Weather Radar (TDWR) uses the 5.6-5.65 GHz band to detect potentially hazardous wind shear conditions at airports to help guide approaching aircraft. Intersil is prepared with work with NTIA and FAA to ensure that unlicensed operations in this band are fully compatible with unimpeded operation of TDWR.

CONCLUSION

Intersil Corporation respectfully requests the Commission to grant the Petition for Rulemaking and to amend Part 15 of the rules, authorizing the use of the 5.470-5.725 GHz band by U-NII devices. The proposed rules should extend the current rules governing the operation of U-NII devices in the 5.25-5.35 GHz band to the newly authorized band.

Respectfully submitted,

Lawrence J. Ciaccia
VP-GM, Wireless Access Products
Intersil Corporation

Dated: February 28, 2002

CERTIFICATE OF SERVICE

I certify that I have sent copies of the foregoing "Comments Of Intersil Corporation" to the persons listed below, by the means indicated.

Mitchell Lazarus
Fletcher, Heald & Hildreth PLC
1300 North 17th Street 11th floor
Arlington VA 22209
703-812-0440

By email and hand delivery:

Chairman Michael Powell
Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Kevin J. Martin
Edmond J. Thomas
Julius P. Knapp
Bruce A. Franca
Michael J. Marcus
Karen Rackley
Lisa Gaisford
John A. Reed
Hugh L. Van Tuyl
Ron Chase

Federal Communications Commission
445 12th Street SW
Washington DC 20554

By first-class mail:

Allan Scott, Corporate Secretary
Wireless Ethernet Compatibility Alliance
2570 West El Camino Real, Suite 304
Mountain View CA 94040-1313

Eric W. DeSilva
Wiley Rein & Fielding LLP
1776 K Street NW
Washington DC 20006