

**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 ACTIONTEC ELECTRONICS, INC.

I. INTRODUCTION

Actiontec Electronics, Inc. hereby submits comments in the above captioned proceeding to encourage 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.

Actiontec Electronics, Inc. is a leading manufacturer of broadband and wireless devices, selling products to customers in the United States, Canada and Europe. Actiontec manufactures a variety of RLAN devices for home and office use, including home wireless gateways, access points, PC Cards, PCI Cards, Mini-PCI cards and USB modules for personal computers.

II. DISCUSSION

A. Additional bandwidth will benefit manufacturers, such as Actiontec, as well as consumers.

Allocating spectrum in the 5.470-5.725 band will enable all users to benefit from additional bandwidth and reduced interference.

By spreading wireless LAN energy over a wider spectrum, interference will be reduced to all users in the band. Furthermore, the additional channels created by this additional spectrum would create additional system capacity – a feature many of our customers require. The additional bandwidth from 5.470 to 5.725 GHz would also allow for a greater number of co-located users to utilize the band on a non-interfering basis. Finally, it would encourage the development of new technologies providing higher data rates than the 54 Mbps provided by today's 802.11a or HIPERLAN2 standard.

B. Allocating this additional spectrum will harmonize North American and European rules, enabling less expensive products to reach the market faster.

Allocating spectrum in the 5.470-5.725 band would allow Actiontec to produce products for multiple markets without modification.

Actiontec manufactures many wireless products for the domestic market and for the European market. However, the products that are sold in Europe require modifications because they operate in different spectrum bands, including the contemplated 5.470-5.725 GHz band. Thus, if the Commission grants the Petition for Rulemaking and allocates this additional band of spectrum for domestic use by RLAN and other wireless devices, Actiontec would be able to manufacture these products for both markets without any modifications. This would allow Actiontec to be more competitive domestically and internationally. Additionally, consumers will benefit by having access to such products faster, and at lower cost.

Actiontec believes 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.

III. CONCLUSION

For the foregoing reasons, Actiontec Electronics, Inc. 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,

ACTIONTEC ELECTRONICS, INC.

By: Ramzi Al-Harayeri
Vice President, General Manager
ACTIONTEC ELECTRONICS, INC.
760 N. Mary Ave.
Sunnyvale, CA 94085
Tel: 408-752-7700

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CERTIFICATE OF SERVICE

I certify that I have sent copies of the foregoing "Comments Of Actiontec Electronics, Inc." 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