Ross Evans
10430 Morado Cir, Apt. 2225
Austin, TX 78759

Federal Communications Commission
Washington, DC

Re: ET Docket No. 02-135

January 3, 2003

Dear Commissioners,

I am a consumer, a private citizen and an active user of Part 15 unlicensed devices, particularly WiFi equipment. I am not a WISP operator or customer, although I have considered being both and may yet become either. I am writing to comment on the Spectrum Policy Task Force Report, and the supporting report by the Task Force's Unlicensed Devices and Experimental Licenses Working Group.

In general, I agree with the recommendation that there be more flexibility to match appropriate antennas with certified "intentional radiators." The current, state of affairs is stifling, confusing and Kafkaesque. There is no compelling justification for the requirement that once a WiFi transmitter is certified and tested with a certain output, with an antenna having a certain gain, that the whole process be repeated in a lab just to re-prove experimentally the mathematical tautology that `15 dBm + 6 dBi = 21 dBm`.

If there is any hole in the current regulatory fabric, it is that antenna manufacturers are under no obligation to submit test reports attesting to the gain characteristics of their products. Should this be rectified, it could be done so at the manufacturer or importer level.

I also agree with the analogy that a more reasonable regulatory model would resemble that now taken with components used to assemble personal computers.

I respectfully suggest, however, that the Task Force recommendations are too narrowly focused on the "special case" of wireless ISPs and Point-to-Point systems. Rather, I think these recommendations should apply equally and equitably to all end-users of such equipment

Just as consumers are competent to assemble PCs from components purchased over-the-counter at their local CompUSA or Fry's, they are competent to attach a properly labeled antenna to a wireless router. No more engineering expertise is required.

Although I am not a WISP operator, I have an interest in the industry and regularly monitor its trade press and online forums. This experience makes me quite sure that the typical WISP operator, who may be a corporate employee or a "Mom and Pop" entrepreneur, is not a radio-frequency engineer. Neither am I. But we all are competent to know which antennas, coupled with which equipment, produce which EIRP.

This stuff just isn't brain surgery! And the WiFi spectrum does not belong to any one industry.