



Before the  
Federal Communications Commission

Washington, DC 20554

In the Matter of

Revision of Parts 2 and 15 of the  
Commission's Rules to Permit Unlicensed  
National Information Infrastructure (U-NII)  
Devices in the 5 GHz band

ET Docket No. 03-122  
RM - 10371

Comments Of Airespace, Inc.

Airespace, Inc. is a manufacturer of wireless local area network (WLAN) systems incorporating the 802.11 standard developed by the Institute of Electrical and Electronic Engineers (IEEE). Airespace fully supports the revision of Parts 2 and 15 of the Rules to permit operation of Unlicensed National Information Infrastructure (U-NII) devices in the 5 GHz band. In particular, Airespace supports the allocation of an additional 255 MHz of internationally harmonized spectrum and that this allocation of spectrum be expedited. Use of the new spectrum should require "wideband" digital technology and disallow narrowband technology, maximizing the utility of the new spectrum for the original intent of the U-NII rules.

To protect incumbent users, Airespace believes that Dynamic Frequency Selection (DFS) with radar detection is an acceptable method. However, the DFS definition should be corrected to note that only uniform spreading of the loading over all available channels is required. In addition, DFS should be required only for central controller devices, not for units under control of a central controller.

Airespace also believes that Transmit Power Control (TPC) should be required only for devices that transmit with a power level that is greater than 3 dB less than the maximum allowed power. Manufacturers should be allowed flexibility in the method of complying with TPC requirements.

Finally, any transition period for the 5250 to 5350 MHz band for compliance with new rules should be tied to the availability of acceptable conformance testing procedures.

Respectfully submitted,

AIRSPACE, INC.

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