

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

	)	
<i>In the Matter of</i>	)	
of revisions of Part 2 an 15 of the Commissions	)	ET Docket No. 03-122
to permit <b>Unlicensed Devices in the 5 GHz Band.</b>	)	RM-10371
	)	

**Comments of Extreme Networks Inc.**

Extreme Networks (“Extreme”) hereby comments on the Federal Communications Commission’s (“the Commission”) rules, FCC 03-287, published in Federal Register, FR Doc. 04-1126, /Vol. 69, No. 12 / Tuesday, January 20, 2004 / Rules and regulations, pages 2677-2688, in the above-captioned proceeding.

In this publication, the Commission states the proposed requirement to a “master-client” U-NII system as follows:

*11. We also sought comment on the proper treatment of U-NII systems where multiple devices operate under the control of a central controller or “master”. Specifically, we proposed to require only the central controller to have DFS capability. We also requested comment on how to identify remote units that operate only under the control of a central controller and .....*

The Commission also states its decision on the above subject as:

*14. We are adopting our proposal to exempt remote devices that are under the control of a central controller from the DFS requirement. .... However, we are not exempting controller devices or “master” from the DFS requirement. ....*

Extreme, which manufactures layer 2 & 3 wired and wireless networking equipments, supports the Commission’s position in DFS requirement to the U-NII systems. However, Extreme would like further clarification of exact meaning or definition of the central controller that must have DFS capability. Extreme suggests that definition of such a central controller should not be limited to a physically stand-alone device, such as an RLAN access point (AP) with full DFS capability. Instead, we suggest that the definition of the central controller (“master”) should be generalized to include network switches (such as Ethernet switches used in enterprise and service provider networks) that can offload DFS capabilities from individual radio devices or a group of radio devices. Radio devices may be placed in different geometrical locations themselves, under the control of the expanded “master”. Further, radio devices may be grouped together (“cluster”) and share the same frequency and DFS functionality under the control of this expanded “master”. The “master” may control multiple radio clusters which operate at different frequencies as

determined by the DFS. For example, in an enterprise RLAN system, several less intelligent APs, or “dumb” APs, may be constructed to be a single AP cluster that is controlled by a network switch with DFS controllability.

Extreme strongly believes that generalizing the DFS concept in a “master-client” U-NII system will greatly benefit technology innovation especially in enterprise data networks. We understand that the original wording in the FCC proceeding may have already covered our proposed concept detailed above and if this is the case we would like to get your clarification and confirmation. Otherwise, we urge the Commission to consider adopting our suggestions.

Respectfully submitted

Vipin Jain  
Vice President and General Manager of LAN Access  
Extreme Networks Inc.  
3585 Monroe Street  
Santa Clara, CA95051  
(408)579-2671 (office)  
vipin@extremenetworks.com

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