



1200 19th. Street, NW, Suite 300  
Washington, DC 20036

To: Vic Hayes  
Chairman, IEEE 802.11 Working Group  
Lucent Technologies WCND  
Zadelstreede 1-10 3431JZ  
Post Box/Zip Code: 4923430 AL  
Nieuwegein, The Netherlands

Cc: J. Ron Cross, President, WINForum  
Joan Letchworth, WINForum

Date: June 4, 1997

Subject: IEEE 802.11 Standard for the Unlicensed National Information Infrastructure Band.

The WINForum Sharing Rules Development Committee (SRDC) is pleased to learn that the IEEE 802.11 working group is considering the development of an interoperability standard for use of the 5.2 GHz Unlicensed National Information Infrastructure (U-NII) band in the US. The SRDC is working on regulatory matters and spectrum coexistence rules concerning this band and we invite the IEEE 802.11 working group to cooperate in establishing spectrum access rules that will permit the efficient operation of the 802.11 MAC both within 802.11 compliant systems and in the presence of non-interoperable systems.

WINForum was the original proponent of the 5.2 GHz broadband allocation for unlicensed use in the US, having filed the original petition with the FCC in May, 1995, and WINForum has been a very active advocate of the U-NII allocation since then. The WINForum SRDC is continuing to work with the US regulatory agencies and other parties to clarify and complete the U-NII regulations and rules of use.

The SRDC has studied the 802.11 Project Authorization Request (PAR) proposal of March, 1997 (IEEE P802.11-97/31r3) and has some preliminary comments and observations.

1. It is the objective of the sharing rules which we are drafting to allow the deployment of radio based networks that provide both a controlled quality of service and a best effort type of service. The IEEE 802.11 MAC is consistent with this objective since it appears to adequately address the best effort type of service.
2. It should be possible to develop sharing rules that permit the basic IEEE 802.11 MAC to operate effectively and to provide spectrum coexistence protection to the MAC in the presence of other non-interoperable systems.

I hope that you will be successful in initiating the U-NII standardization project at your July meeting and I look forward to working with the 802.11 committee to further advance the standardization of wireless high speed local area networks.

Sincerely,

Donald C. Johnson  
Chairman, WINForum Sharing Rules Development Committee