

Project	IEEE 802.18 Radio Regulatory Technical Advisory Group
Title	Proposed comments to FCC NPRM on 5 GHz (ET Docket No. 03-122 RM – 10371)
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Re:	This contribution is submitted to highlight some concerns that Nortel Networks has regarding the implementation dates for DFS.
Abstract	The contribution provides questions and potential comments for a IEEE 802.18 input to the FCC on ET Docket No. 03-122, RM - 10371
Purpose	It is proposed that IEEE 802.18 consider these comments when developing their comments to the FCC. It is hoped these comments will serve to begin an exchange of views.
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Proposals for Inclusion in IEEE 802.18 Comments on ET Docket No. 03-122

Mike Lynch, Nortel Networks

1 Introduction

The implementation of DFS in portions of the 5 GHz band was necessary in order to achieve an allocation for RLANS/WAS at WRC-03. The intent of DFS is to protect in band spaceborne satellite systems. There are several issues that need to be considered by the FCC when they mandate the use of DFS.

2 Points to consider

- Is the proposed one year transition period sufficient? Would a longer period be better?
- What is the impact on the rollout of non-DFS equipped systems/networks of a short transition period? Will it delay or otherwise slow deployment?
- What is the impact on non-DFS equipped systems/networks if the operator chooses to replace or add access points after the transition date? Would the entire network have to be replaced or upgraded? It seems possible that a network of access points may not be able to consist of both non-DFS and DFS enabled access points.
- Should the FCC allow networks deployed prior to the end of transition period to continue to operate and expand, and if so should there be a limit on that expansion?

3 Proposal

That IEEE 802.18 consider these points and develop comments to the FCC that encourage the maximum flexibility for those systems deployed prior to the mandated implementation for DFS and that the transition period be greater than one year. Doing so will encourage deployment of RLANS/WAS in the 5 GHz band.