

In reference to the RA Consultation Document, 'Use of License-Exempt Spectrum For Provision of Public Telecommunication Services' – October 2001; please find enclosed our contribution :-

In reply to Q1 :-

The Bluetooth SIG expects to see substantial gains and benefits from allowing commercial use of license-exempt bands, for governmental agencies, business organisations and end-consumers.

In reply to Q2 :-

The Bluetooth SIG believes that interference already exists in these bands, and although it is true to say that increased use will increase the probability of interference, the actual end-user perceived interference activity will be mostly non-noticeable.

The Bluetooth SIG Regulatory Committee has worked with many regulatory authorities around the world, and the number of substantiated cases of interference seen is low.

Additionally, as the recipient of any interference from a public access point will most likely be an employee or customer of the licensee, we feel that it is within the responsibility scope of the licensee to adequately manage this.

By their very ad-hoc nature where frequencies are shared, the technology enabling equipment used is generally designed to maximise the use of the devices. In Bluetooth technology's case - this is done by frequency hopping.

In reply to Q3 :-

The Bluetooth SIG believes that if the take-up of services is highly successful, there is a possibility of observing congestion in hot spots – this could ultimately limit throughput of data.

The Bluetooth SIG believes that such cases can be addressed by the relevant industry, since it is in their interests to do so.

In reply to Q4 :-

The Bluetooth SIG believes that a variety of approaches should be applied to different bands, as to provide for the widest diversity of services and products.

To quote an example, the Bluetooth (ISM) band at 2.4 GHz, is already used by a variety of devices and we feel should be deregulated, other than by strict adherence to power limits/spectral density. The usage of higher power limits should only be permitted accompanied by duty cycle and/or timing limits, or a minimum height above floor/ground restriction.

In reply to Q5 :-

The Bluetooth SIG believes that public telecommunication service providers may wish to offer services in the license-exempt spectrum, to compliment their offerings portfolio.

The Bluetooth SIG has analysed potential services, and in general these are of a nature which public telecommunication service providers do not currently offer.

In reply to Q6 :-

By consultation with many member companies (chiefly the Mobile Telephony divisions of Ericsson, Nokia and Motorola), the Bluetooth SIG contends the statement that Spectrum Pricing has helped in generating the current 43 Million mobile telephony subscribers. It is our belief that profit-driven operators seek to optimise their economic potential whatever the licence fee cost.

The Bluetooth SIG analysis has shown that potential user take-up will be market driven.

In reply to Q7:-

The Bluetooth SIG's opinion is only concerned with the ISM - 2.4GHz Frequency Band. We feel this band is suitable for the mentioned scenario.

In reply to Q8:-

The Bluetooth SIG envisions no potential problems associated with allowing commercial services in license-exempt spectrum.

In reply to Q9:-

The Bluetooth SIG believes that if public telecommunications services are permitted in license exempt spectrum, they should be available as soon as it is practical. Bluetooth technology is starting its market ramp-up and would benefit from this availability.

Please do not hesitate to contact me if I can be of further assistance.

Thank-you and regards,

Eur. Ing. **Miguel Bravo-Escos** MEng, BEng (Hons), CEng, MIEE
Chair - Regulatory Working Group
Bluetooth SIG

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Bluetooth SIG, Inc.

c/o Cambridge Silicon Radio
Science Park, Milton Road
Cambridge, CB4 0WH, UK
