

**IEEE 802.16 Working Group on Broadband Wireless Access**<http://WirelessMAN.org>

17 September 2004

To: Daleep Mohla, Chair, IEEE-SA Standards Board New Standards Committee (NesCom)

Dear Chairman Mohla,

We understand that the Chair of the IEEE 802.20 Working Group has carried to NesCom the protest made earlier within the IEEE 802 LMSC against the proposed P802.16e PAR modifications. We strongly encourage NesCom to approve the revised PAR in spite of this protest.

As both projects have the same sponsor, and since the issue had to do with Sponsor policies regarding distinct identity between projects, it was appropriate for 802.20 to raise the issue within IEEE 802. The 802.16 WG responded <[http://ieee802.org/16/docs/04/80216-04\\_43r1.pdf](http://ieee802.org/16/docs/04/80216-04_43r1.pdf)> to the 802.20 concerns, making several PAR changes in the process. *After reviewing the discussion, the Sponsor voted to forward the PAR to NesCom.*

We respect the 802.20 WG opinion that there is an overlap in application with P802.16e. Partial overlap has been an aspect of the two projects from their start. This is not unique in 802. Many 802 projects have overlapping applications, but 802 has successfully proceeded with them anyway. Despite the partial overlap, *the two projects are distinct, and the proposed PAR modifications do not materially affect the distinction.* P802.16e remains an upgrade to the fixed wireless technology currently specified in IEEE Standard 802.16-2004, while 802.20, working with a clean slate, can still develop an optimized, mobile-centric air interface standard, per its PAR.

Since P802.16e's inception, the 802.16 WG has worked through 11 bi-monthly sessions, with session attendance growing to 332 people. Attendees have come from twenty-three countries. During this period, WG membership has surged from 82 to 151 <<http://ieee802.org/16/members.html>>, with *over 100 more individuals* standing to gain membership at our November session. Most are interested in P802.16e, and many have been engaged virtually full time in its development. Of the current membership, only 30 were members at the time of the original P802.16e PAR approval. Concurrent with this shift in participant base, the outside regulatory, market, and consumer environment has also evolved. These changes have driven the WG to modify the PAR.

The modified P802.16e PAR change is a carefully considered response to the strong and clear demand by a world industry that has focused its attention on this project. It reflects not speculation as to what the WG might achieve but rather to *specific text on which the WG has already reached consensus.* Since the Standards Board approved the P802.16e PAR in December 2002 (simultaneously approving the P802.20 PAR), the P802.16e work has progressed through five versions of a pre-draft working document and five more versions of a formal IEEE draft, subject to formal WG ballot, and has been widely commented upon by both WG members and nonmembers alike. This year alone, we have processed nearly 400 documents contributed toward the content of the draft, many of which were revised again and again to achieve greater industry consensus. *At its session this month in Seoul, Korea, the WG unanimously voted to move Draft 5, which is written in accordance with the proposed PAR, to IEEE Sponsor Ballot* following a WG confirmation ballot and Sponsor approval. We are very close to achieving broad, worldwide industry consensus on this important standard, and *the WG aims to submit a final draft to RevCom by the end of 2004.*

Many P802.16e participants have expressed concern about the possible delay in approval of the modified PAR. Some proposed to bring their concerns directly to NesCom, but the WG Chair offered to collect and consolidate them. We call your attention to these statements provided by industry participants as an indication of the enthusiastic worldwide industry support for a standard based on the modified P802.16e PAR. The statements can be found in IEEE 802.16-04/61 <[http://iee802.org/16/docs/04/80216-04\\_61.pdf](http://iee802.org/16/docs/04/80216-04_61.pdf)>:

- **Statement 1** is from a number of Korean vendors and operators as well as a government research institute. The Korean community is very engaged in and supportive of P802.16e and has strongly encouraged the PAR change so that the standard will be more applicable to their market and regulatory requirements. Denial of the PAR changes would be a direct affront to this constituency.
- **Statement 2** is from two major U.S.-based wireless carriers who clearly share many of the opinions of the Korean community. Attachments 1 and 2 both refer to joint contributions made by the U.S. and Korean carriers to the P802.16e development process.
- **Statement 3** is from the Wireless Communications Association International (WCA), the trade association for the wireless broadband industry.
- **Statement 4** is from the WiMAX Forum, a large nonprofit organization supporting interoperability testing for IEEE 802.16 products.
- **Statement 5** is from Intel Corp., one of many companies actively supporting the 802.16 activities.

We understand that NesCom sometimes faces difficult dilemmas in resolving issues of overlap between Sponsors. We remind NesCom that this is *not* such an issue. The objections raised by the 802.20 WG are primarily technical and were reviewed by the technical experts in the 802.16 WG, the 802 community at large, and the 802 Executive Committee. After internal debate and review of issues regarding distinct identity, *the Sponsor chose to submit the modified PAR to NesCom.*

From the WG perspective, the PAR modification is not new. The 802.16 WG drafted the modified PAR at its May 2004 session in Shenzhen, China. The group respects the Sponsor and NesCom procedures and has waited patiently for the process to unfold. *Any delay in approval would have a major impact on progress and seriously impact the world industry that anxiously awaits P802.16e completion.*

As participants in the IEEE-SA standards process, we all face the challenge of maintaining our relevance by producing timely work in the face of a rapidly changing environment. Since its inception in 1999, the 802.16 WG has completed nine projects and has a well-earned reputation for on-time delivery of relevant standards. The IEEE-SA must continue to foster an environment that rewards the productive efforts of its participants.

We strongly recommend that NesCom, while respecting the interests of the 802.20 WG in creating and developing a draft, not allow that *future* interest to inhibit the *current* ability of the P802.16e project to deliver the globally standardized technical solution that the world demands of it.

We thank the members of NesCom for their patience and deliberation on this important matter.

Regards,

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Chair, IEEE 802.16 Working Group on Broadband Wireless Access

Brian G. Kiernan  
Chair, IEEE 802.16e Task Group