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Title	Comments on 802.11 CBP Study Group's Draft PAR	
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Re:	IEEE 802.11 Contention Based Protocol Study Group Draft PAR document	
Abstract		
Purpose		
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Comments on 802.11 CBP Study Group's Draft PAR

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1 Introduction

This contribution proposes comments to the Draft PAR prepared by the 802.11 Contention Based Protocol Study Group (CBP SG). The SG should be commended for moving fast on developing this PAR for a standard targeting this band.

This PAR has resulted from FCC opening up the 3650-3700 MHz band in the USA with a non-exclusive licensed approach allowing more Service Providers to avail the spectrum and compete and share the bands using a contention based protocol approach.

Several members of IEEE 802.16 WG have also been interested in making use of this band and the 802.16h project that has been developing co-existence procedures of license exempt bands see this band as an opportunity to make use of it as the contention protocol required is very much similar in terms of a technical solution.

2 Comments on the PAR

Even though FCC took a really bold step in this 3650-3700 band rule, there some issues in being able to use the rules in current form and hence the SG needs to consider this before such a PAR is finalized.

2.1 Interpretation of the "Contention Based Protocol"

There is lack of a clear definition of what the "Contention Based Protocol" means. Several members in 802.16 WG believe that "contention based protocol" does not literally mean a contention access, but rather a need for two service providers who are licensees to contend for using the spectrum and not literal contention based access. This requires better clarification in the FCC rule.

2.2 Several petitions filed with FCC regarding this band ruling

Presently petitions have been filed with FCC by many individual members for reconsideration of the rules, due to market impacts. As a result there is a possibility some rule changes may result from these petitions.

2.3 Band Usage Characteristics

Presently the PAR is targeted for 3650 band, but this band usage characteristics may not be limited to local areas and could also cover metropolitan areas. Hence it is also reasonable to question whether this project would define usage of 3650 band in local areas only, and not conflict with usage in metropolitan areas, because then it would be within purview of the 802.16 WG's scope. At least the PAR and 5 Criteria do not make this clear.

3 Recommendation

It maybe ideal given the lack of clarity in the FCC rules and the existence of several petitions for this band, that the 802.11 CBP SG, wait to submit the PAR for approval till the FCC rules are mostly final.

In addition it maybe worthwhile for the 802.11 CBP SG to collaborate more with 802.16 members and figure out how usage for local areas and metropolitan areas can be achieved at the same time independently.