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RE: IPWireless Compliance with 47 CFR 21.122

To Whom it May Concern:

Derivation of Data Rates to Show compliance to 47 CFR 21.122

The air interface employed by the Model AP uses complex spreading of the baseband data as a result of the complex direct sequence code division multiple access (DS-SS) multiplexing and QPSK modulation.

The air interface chip rate used by the Model AP is 7.68 Mcps. Using QPSK and a spreading factor (SF) of one, the maximum baseband data rate supported by the AP is thus two times the chip rate, or 15.36 Mbps.

To comply with 47CFR21.122, a bit rate of 10 Mbps is required. This is due to the necessary bandwidth being specified as 12 MHz, which includes 2 MHz of guard channel from adjacent channel transmitters. The Model AN air interface supports a maximum bit rate that is 28% higher than the specified requirement including the guard band, and is 53.6% higher than the requirement if the guard band is not included in the calculation as allowed in 21.122 (a).