

February 8, 2006

Mr. Jerry Upton  
Chair, IEEE 802.20 Working Group  
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Dear Jerry,

We are participants in the IEEE 802.20 working group. We are writing to request the recall of the letter ballot initiated on January 27, 2006, on the grounds that such letter ballot was improperly issued.

### Background

The 802.20 Technology Selection Process (TSP) Document dated September 22, 2005 (doc IEEE P802.20-PD-10) sets forth procedures for the 802.20 working group to adopt a technology as an approved specification.

However, according to section 2.9.2 of the Policies and Procedures of IEEE Project 802 Working Group 802.20 (Mobile Broadband Wireless Access) Version 1.0, dated January 8, 2004 (the 802.20 P&P), the following steps are required before issuing a letter ballot:

#### *2.9.2 Draft Standard Balloting Requirements*

*Before a draft is submitted to WG letter ballot, it shall meet the following requirements:*

- 1. The TG must approve the draft by at least 75%, indicating the TG has conducted a technical review of the draft, and believes the draft is technically complete, and ready for WG approval e.g. not place holders or notes for future action, editing, or clarifications.*
- 2. It must be made available per sub clause 2.5.*
- 3. If any changes need to be made to the draft after posting, these changes, whether technical or editorial, shall be approved prior to the vote for approval to go to WG letter ballot. The editor will be instructed to incorporate these changes whether technical or editorial into the draft prior to the release of the draft to letter ballot.*
- 4. Any voting member can bring a motion requesting that, after the editor has completed the draft, work be approved by a fifteen day confirmation letter ballot of the draft before submission to WG letter ballot. This will be a procedural motion requiring simple majority.*
- 5. The availability of the draft must be announced on the WG email reflector during or prior to the WG session or regularly scheduled interim session.*
- 6. The draft must be formatted according to sub clause 2.9.3.*
- 7. The draft must be approved for submittal to WG letter ballot at the 802.20 WG closing plenary. This will be a technical motion requiring at least 75% approval.*

Although section 3.4 subsections (9) and (10) of the TSP Document state that “*Having attained 75% support, the prevailing proposal will be adopted as the initial technical specification of IEEE*

*802.20 without further vote” and “The IEEE 802.20 Editor shall prepare Draft 1.0 from this technical specification. The Draft 1.0 shall be forwarded to the working group for letter ballot”,* section 4.0 of the same document states that in the event of conflict between 802.20 P&P and the TSP Document, the 802.20 P&P shall prevail and supersede the TSP Document.

There is clearly a conflict between section 3.4 subsections (9) and (10) of the TSP Document and section 2.9.2 of the 802.20 P&P. Therefore, in accordance with section 4.0 of the TSP Document, in the event of a conflict, section 2.9.2 of the 802.20 P&P must prevail.

#### Actions in 802.20 Working Group

At the January 2006 meeting of the 802.20 working group, in accordance with section 3.4 of the TSP Document, two technology “down-selection” votes were taken by secret ballot. (One to select an FDD proposal and the second to select a TDD proposal.) A technical proposal for each of FDD and TDD prevailed. On January 27, 2006, a draft containing both these proposals was circulated on a letter ballot to move the document to sponsor ballot.

We submit that none of the conditions 2.9.2 of the 802.20 P&P have been met. Although secret ballots were taken on selecting a TDD proposal and an FDD proposal, no ballot was taken on the complete “draft” as required by section 2.9.2. The working group discussed the MBTDD and MBFDD proposals separately, but did not have an opportunity to either review or discuss a final form of the draft, nor the completeness of the draft for adoption as a standard. There exists a proposed draft contribution (C802.20-06/04) that contains the MBTDD and MBFDD proposals. But other than the fact that the Chair mentioned that it would be the basis of the draft for letter ballot, there was no discussion or decision made to adopt it as the basis of the working group “draft”.

The secret ballots taken on the TDD and FDD down selection did not meet the requirements of section 2.9.2 subsections (2) and (6). The distribution of contributions does not provide the same notice to working group members as the distribution of a “draft” as required by section 2.9.2 subsection (5). Working group members were not afforded the opportunity to review the draft in its entirety or suggest editorial or technical improvements as required by section 2.9.2 subsection (3). The process used by the chair to forward the document to letter ballot had the effect of denying working group members the opportunity to request a confirmation letter ballot as contemplated by section 2.9.2 subsection (4).

More significantly, in accordance with section 2.9.2 subsection (7) of the 802.20 P&P, a draft standard must be approved by a technical motion. Of course this was not possible and did not happen, because the draft was not even published until January 27, 2006, several days after the close of the working group meetings. Further, there has not been any motion, technical or otherwise, to take the down-selected proposal to letter ballot.

Because the conditions to letter ballot set forth in section 2.9.2 of the 802.20 P&P were not met, the initiation on January 27, 2006 of letter ballot to “Forward the Draft 1.0 of IEEE 802.20 to Sponsor Ballot” was improper and invalid.

We therefore request the immediate rescission and cancellation of the pending letter ballot. If determined to be appropriate, we expect that a motion to initiate a letter ballot might be taken up at the next regularly scheduled meeting of the working group in Denver in March, but only after complete technical review of the draft by the working group for readiness to go to letter ballot to ensure a high quality standard.

### Summary

The development process for the 802.20 specification has already been artificially compressed into a far shorter time than most members of the working group have ever experienced, and certainly does not match the pace of development activity for the first three years of the working group's existence. For good or for ill, it appears that the TSP Document can in some cases allow for such a compressed work schedule. However, the development process for this specification may not be subverted in violation of the 802.20 P&P.

Regrettably, decisions taken by the Chair at the January working group meeting violated the 802.20 P&P. As noted above, the conditions to letter ballot set forth in section 2.9.2 of the 802.20 P&P were not met. The IEEE's rules governing the development of a technical standard have been carefully crafted to help ensure that robust, complete, and accurate standards are adopted, with proper review of the technical and editorial content by the working group before they become finalized. The rule requiring a technical motion to initiate issuance of a letter ballot is a vital step in IEEE 802.20's standard development process. That rule must be observed.

Now that we have called your attention to this procedural violation, we hope this matter can be quickly addressed and resolved. As this is a very serious issue, if action is not taken to promptly rescind and cancel the letter ballot, we are prepared to escalate to the 802 Sponsor Executive Committee, in accordance with their guidelines. We would appreciate your response by February 15.

Thank you for your consideration.

Sincerely,

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