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December 7, 1998

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communication Commission
1919 M Street NW, Room 222
Washington, DC 20554

Dear Ms. Salas,

We have become aware of the FCC's Notice of Inquiry regarding Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems (FCC 98-208, ET Docket No. 98-153). We are especially concerned with the discussion in paragraph 7 which mentions the new developments of ground penetrating radar. Technos routinely uses ground penetrating radar (GPR) for a variety of subsurface applications. Ground penetrating radar was commercially developed over 25 years ago and is an extremely effective tool for environmental and geotechnical applications along with unexploded ordinance and mine detection. GPR is a state-of-practice tool used by many engineers, geophysicists, geologists, and military personnel in the United States and throughout the world.

Ground penetrating radar is a low-power instrument that directs a signal into the ground. Over our extensive 25 years of experience with GPR, we know of no incidents where it caused interference to radio, TV, or communications signals. We have used GPR at major airports, military bases, utility centers, and within buildings and have never received complaints about interference. The low power radiated into the ground simply does not affect other transmissions.

Technos and the entire industry of GPR users are strongly against the newly proposed regulations. The regulations would defeat the purpose of GPR making it ineffective and prohibitively expensive. The regulations would in-effect remove one of the most successful shallow subsurface exploration tools that we have available today. The regulations would compromise the safety of those working on environmental and geotechnical projects as well as military personal working on mine detection.

We request that you do NOT impose these rules on GPR.

Sincerely,



Richard C. Benson
President

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