

Revision of Part 15 of the Commission's
Rules Regarding Ultra-Wideband
Transmission Systems

The Community Technology Centers' Network (CTCNet) is a national network of more than 250 organizations, mostly in low-income communities, where people can get access to computers and computer-related technology, such as the Internet, together with classes and/or informal learning opportunities where skills can be developed and utilized (<http://www.ctcnet.org>). The Network had its roots in Playing To Win (PTW), a non-profit, which was established in 1980 to counter inequities in computer access. In 1983, PTW's public access computer center opened in a public housing project in Harlem, NY. Its success brought it many requests for advice and assistance from people across the country and, in 1990, the Playing to Win Network was established to encourage mutual support among a variety of computer access programs and facilitate their sharing of information. Since 1992, the Network has received its principal financial support from the National Science Foundation and, in 1995, it became a project of Education Development Center (EDC) with its name changing at the same time to the Community Technology Centers' Network.

The 250+ organizations that are currently members of CTCNet are located in both urban and rural areas of 34 states. They include multiservice agencies, community networks, adult literacy programs, job training and entrepreneurship programs, public housing facilities, public libraries, schools, cable television access centers, and after-school programs, each with its own technology and public policy programs.

In reviewing comments submitted pursuant to this Notice Of Inquiry by the FCC, we are encouraged by the evidence provided that the operation of ultra-wideband (UWB) radio systems on an unlicensed basis under Part 15 of FCC rules can bring great advances to public health and safety through the development of advanced collision warning and avoidance systems in the automotive industry, systems that help to locate lost individuals, and penetrating radars that can improve bridge and roadway inspections and aid in the detection of unexploded ordnances and landmines. Most closely related to our organizational mission, we are encouraged by comments that suggest that an FCC rulemaking could alter frequency and power restriction on the operations of spread spectrum radios in ways that would facilitate universal public access to advanced telecommunications capabilities, consistent with the Congressional mandate of Section 706 of the Telecommunications Act of 1996.

We recognize that spread spectrum radio devices can play a particularly valuable role in providing Internet connectivity both to individuals in remote regions and to publicly accessible facilities, such as libraries, schools and health care institutions and community centers, especially (but not

exclusively) in rural regions where high bandwidth services are most costly to establish and maintain.

A variety of comments have urged that UWB devices be permitted to operate under Part 15, in a variety of previously inaccessible parts of the spectrum, so long as they do not cause harmful interference to existing services and they accept the interference from other operations and services authorized under Part 15. Those comments are supported by evidence that UWB devices can operate without adding more interference than the background "noise" emitted via unintentional radiation of common devices, such as personal computers. We hope that this position is found persuasive by the FCC, since a broadening of the spectrum accessible for interactive communications and other UWB systems, together with permission for sufficient power so that the new capabilities can readily reach all neighborhoods of cities from central points, can bring with it such enormous public benefits. We applaud the FCC's willingness to examine new opportunities in these areas, and hope that the result will be proposed rules enabling the development and deployment of UWB devices.

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