

06 January 1999

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
1919 M. Street NW
Washington, DC 20555

Re: FCC 98-208, Docket No.98-153

Dear Ms. Salas:

Weston has become aware of the FCC's Notice of Inquiry (NOI) regarding the Revision of Part 15 of the Commission's Rules regarding Ultra-Wideband Transmission Systems. We are particularly concerned with the Paragraph 7 regarding new the developments of ground penetrating radar (GPR). Weston has been routinely using GPR since 1978 in a variety of applications. GPR is a valuable tool to us, which allows us to develop a site framework necessary to expose features otherwise hidden beneath the surface. This valuable information allows our staff and clients (site investigators, hydrogeologists, engineers, planners, or developers) to better understand the subsurface of a site to direct their remediation/construction efforts, save time, reduce costs, and minimize liabilities and health and safety risk factors.

Since 1982 I personally have conducted close to 200 GPR surveys in both rural and urban settings, including numerous Air Force Bases and other military Facilities. At several facilities, flight line or explosive ordnance demolition (EOD) personnel have even evaluated our GPR system/transmission specifications to address potential interference's with base operations. In each case, it was determined that the low power radiated into the ground simply did not effect other transmissions.

The newly proposed regulation would in-effect eliminate the use of one of the most valuable (proven) methods available today for shallow surface exploration. Additionally, the regulations could adversely affect the safety of those dependant on the information provided by GPR.

Therefore my colleagues and I strongly OPPOSE the newly proposed regulation. We request that you do not impose these rules on GPR.

Respectfully yours,

John Williams
Technical Manager
Roy F. Weston, Inc.

JAW/jaw