

**GEO-RECOVERY SYSTEMS, INC.**

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January 5, 1999

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

RE: FCC ET Doc. NO. 98-153 Notice of Inquiry in the matter of Revision of Part 15 of the Commission's Rules Regarding Ultra Wide Band Systems

Dear Federal Communications Commission:

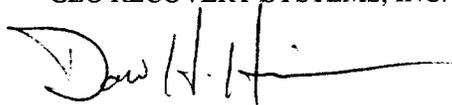
In response to the referenced "notice of inquiry" concerning permission to operate ground penetrating radar as well as electromagnetic induction equipment, Geo Recovery Systems suggests the commission allow unrestricted and unlicensed usage of such methods and equipment.

Geo Recovery Systems, being a long term user(over 25 years)of the methods employing the radio frequencies in question generated by the equipment, believes the commission must be made aware the techniques are generally utilized on an random, limited basis in numerous cultural situations, and normally, over a very short time duration. As it is the purpose and nature of the equipment's low power emissions and shielding to primarily facilitate observation of ground or subsurface conditions, little airborne radio wave emissions are observed at any great distances from the equipment. Therefore it is suggested, at least for ground penetrating radar and electromagnetic induction methods, there is an extremely limited potential for interference with other operating ultra-wide band radio systems.

Utilization of the methods by knowledgeable experts, such as the geophysical professionals at Geo Recovery Systems, as well as other professional organizations, indicate the usefulness of the methods for: environmental cleanup, archaeological, forensic, infrastructure engineering, natural resource evaluation, mining, construction, military applications, underground utility detection and geologic mapping investigations are significantly important to the scientific community.

As a result of the demonstrated historic, as well as humanitarian related usefulness of ground penetrating radar and electromagnetic methods, any restrictions upon it usage must be considered detrimental to society in general.

Sincerely,  
GEO RECOVERY SYSTEMS, INC.



Don H. Heimmer, P.G.  
President

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