

**Before the
FEDERAL COMMUNICATIONS COMMISSION**

In the Matter of)
)
Revision of Part 15 of the Commission's) **Docket No. 98-153**
Rules Regarding Ultra-Wideband
Transmission Systems

To: The Chief, Office of Engineering and Technology

REPLY COMMENTS OF XTREMESPECTRUM, INC.

XtremeSpectrum, Inc. would like to express its appreciation to the commission for instituting this Notice of Inquiry. We have noted the impressive interest expressed in the large number of comments filed with the commission concerning their Notice of Inquiry on Rules Regarding Ultra-Wideband (UWB) Transmission Systems. Of special note is the diversity of opinion and perspective on the potential of UWB interference. We stand ready to assist the commission in any way toward resolving any of the technical and/or policy issues that stand in the way of adoption of favorable UWB Rules and Regulations. We believe the comments support the following:

- Unlicensed UWB devices should be allowed to intentionally radiate under the regulations currently applying to unintentional radiators. The current operation of numerous unintentional radiators clearly indicate that the current restriction levels are adequate.
- Licensed UWB systems may be necessary to allow systems with higher power to operate in noisy environments such as industrial manufacturing plants. We would prefer, however, rules that allow unlicensed operation with radiation levels restricted outside of clear boundaries, such as outside of a building, or the property line of a user, within which the UWB system is built to operate.
- Waivers for UWB systems that conform to restricted band power levels should be granted immediately.
- Adoption of rules authorizing UWB systems should be undertaken as expeditiously as possible.
- The type of modulation should not be regulated. Instead, the power spectral density should be regulated. (Nearly all of the qualitative and quantitative measurements we have made indicate that it is W/Hz within a victim receiver passband that governs the interference level, not the form of modulation (e.g. Pseudo-noise FM, AM, PPM, BPSK, etc. and swept FM).

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