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Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of)
)
Revision of Part 15 of the Commission's)
Rules Regarding Ultra-Wideband) ET Docket 98-153
Transmission Systems)
)

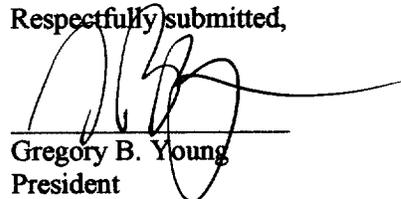
Reply Comments

ENSCO, Inc. submits these reply comments in response to the comments filed with the Commission in the above referenced proceeding.

- ◆ ENSCO, Inc. is a 650+ employee firm located in Springfield, Virginia, providing sensor, signal processing, and engineering solutions to a variety of government and commercial customers. ENSCO has been involved in ground-penetrating radar technology for more than 25 years, including work in system design and development and field applications for both custom and off-the-shelf hardware. ENSCO is also pursuing applications of UWB technology for a variety of new applications.
- ◆ ENSCO concurs with the majority of comments filed in this proceeding which conclude UWB technology is a useful tool that will enhance safety, reduce costs, and support economic growth in a wide range of application areas. We encourage the Commission to modify Part 15 to allow these devices.
- ◆ The cumulative effect on licensed transmissions by a proliferation of UWB devices is a concern raised by some comments. ENSCO encourages the Commission to consider the observable impact of numerous unintentional radiators as a model in evaluating the potential impact of multiple, much lower-power, UWB devices. For example, large urban office complexes with hundreds or thousands of computers, associated peripherals, and other unintentional radiators provide test cases of large numbers of ultra-wideband emitters, many of which radiate into protected bands at power levels much higher than currently requested for UWB devices. If these devices have no impact on licensed transmissions, it should therefore be apparent that the much lower-power UWB devices should have negligible effect.
- ◆ ENSCO supports the arguments and conclusions of the Ultra-Wideband Working Group.

Dated: January 27, 1999

Respectfully submitted,



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