I am an independent consultant working in the areas of EMC and radio equipment approvals. I spent 8 years as an electronic engineer in the Equipment Authorization Branch at the FCC Laboratory. During the time I worked at FCC, as is the case now, radiated emissions limits and test methods were developed over a fairly lengthy period of time, following formal rulemaking procedures, and giving due consideration to the concerns of RF spectrum users, both government and non-government.

As a result of this process, and in response to the concerns of commenters, the (at that time) new Citizens Band rules required that radiation from CB receivers be limited to 5 uV/m at 3m. General limits for Part 15
transmitters were 15 uV/m at a distance of emission wavelength divided by 2*pi. For a 5.8 GHz device, this distance is approximately 2 inches, rendering such a communications link useless. Spurious and harmonic emissions from other intentional radiators were 15 uV/m @3m.

Ten years ago Part 15 was re-written. One of the changes made was to increase restricted band limits from 15 uV/m@ 3m, to between 100 and 500 uV/m @3m, depending on frequency. Another change was to make the general limits for intentional radiators the same as the restricted band levels. These changes do not appear to have resulted in a corresponding increase in interference complaints, despite the geometric increase in the number of ubiquitous radio devices, such as cellular telephones, Part 15 devices such as cordless telephones, spread spectrum transceivers, pulsed microwave field disturbance sensors,radio modems, and numerous other consumer and commercial devices.

Where there have been cases of harmful interference, the general technical requirements in Part 15 concerning non-interference seem to be adequate controls, as the increase in number of interference complaints has not risen, in proportion, anywhere near the increase in the number of RF devices, including wideband devices such as spread spectrum and U-NII.

The current limits and test methods for measuring radiated emissions have been applied to emissions from narrowband sources such as local oscillators, and to very wideband sources such as direct sequence spread spectrum systems and U-NII transmitters. The IF and video resolution bandwidths used when measuring these broadband signals are adequate and appropriate for measuring radiated interference potential from UWB devices as well. The pulse desensitization correction is not applicable as it is not an indictor of interference potential to victim receivers.

Historically, the current limits for unintetional radiators and intentional radiators seem to have been more than adequate in maintaining low levels of interference. There does not appear to be any compelling reasons for requiring that UWB devices be measured any differently.