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October 13, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ***Ex Parte* Notification - ET Docket No.
98-153**

Dear Ms. Salas:

This is to note that on October 12, 1999, Ralph Petroff, Chairman of the Board of Time Domain Corporation, made an *ex parte* presentation to Mr. Julius Knapp, Chief of the Policy and Rules Division of the Office of Engineering and Technology, during a brief telephone call discussing the Commission's Inquiry into Ultra-Wideband ("UWB") radio frequency technologies.

Mr. Petroff mentioned the International Bureau's recent authorization of mobile satellite terminals for AirTouch released October 4, 1999, and urged Mr. Knapp to consider the discussion in that decision pertaining to emissions falling into GPS bands. Mr. Petroff also noted that the studies of which he was aware examining the question of cumulative effects of emissions from ultra-wideband devices have found that the predominant effect is from the closest emitter and that such a signal source had more impact than heavy concentrations of more distant emitters. With respect to a possible regulatory framework for unlicensed UWB devices, Mr. Petroff urged that the Commission consider indoor applications as at least one initial use of the technology. Mr. Petroff also noted that the Ultra-Wideband Working Group was moving

WILEY, REIN & FIELDING

Magalie Roman Salas
October 13, 1999
Page 2

forward with efforts to enlist participation by interested parties in the testing of UWB technology in order to facilitate any rule making that might be initiated. Finally, Mr. Petroff reports that he urged the Commission to move forward with the initiation of such a rule making and that he noted that UWB efforts have now been started by developers in other countries.

Respectfully,

/s/ David E. Hilliard

David E. Hilliard
Counsel for Time Domain Corporation

cc: Mr. Julius Knapp