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January 19, 2000

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RECEIVED

JAN 19 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

VIA COURIER

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W. TW-A325  
Washington, DC 20554

Re: Ex Parte Submission, Revision of Part 15 of the Commission's Rules  
Regarding Ultra-Wideband Transmission Systems, ET Docket No. 98-153

Dear Ms. Roman Salas:

This letter supplements my earlier filing on January 12, 2000. On January 11, 2000 the undersigned, along with Mr. Scott Blake Harris, met with Ms. Kathy Brown, Chief of Staff to Chairman Kennard, to discuss the above-referenced proceeding.

We discussed the timing for the Commission's initiation of a rulemaking on UWB technology. In particular, we expressed support for the Office of Engineering and Technology's progress in drafting a Notice of Proposed Rulemaking ("NPRM"), and our hope that the Commission would issue a NPRM in the near future. We asked the Commission to consider issuing a NPRM with few issues decided and the majority of the issues left open for comment. Finally, we discussed the issue of possible interference by UWB technology with GPS. We urged the Commission to determine through the rulemaking process and testing an appropriate standard below which there would be no harmful interference to GPS, and then allow industry to figure out how to satisfy this standard. We expressed the belief that the Commission should not specify certain center frequencies for UWB applications, rather this issue should be left open for comment in the rulemaking.

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Pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. §1.1206, an original and a copy of this letter have been submitted for inclusion in the public record.

Please contact me at the phone number listed above if you have any questions concerning this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey L. Ross". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

Jeffrey L. Ross  
Counsel to  
Time Domain Corporation