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April 6, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dale N. Hatfield
Federal Communications Commission
Office of Engineering and Technology
The Portals Building
445 12th Street, SW
Room MS1-300
Washington, DC 20554

Re: Notice of Inquiry Regarding Revision of
Part 15 of the Commission's Rules
Regarding Ultra-Wideband
Transmission Systems, ET Docket 98-153

Dear Mr. Hatfield:

On February 24, 2000, James Lovette, of Fantasma Networks, Inc, the undersigned, and William Gamble, representing Fantasma, met with you and others from the Office of Engineering and Technology to discuss a variety of issues associated with the Commission's review of ultra-wideband technologies referenced above.

At that time we discussed a Fantasma proposal that would permit early deployment of UWB for communications and we distributed a one-page summary of rules that Fantasma proposes to permit such deployment. We are now submitting that summary for the record in the above-referenced proceeding.

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Please direct any questions regarding this matter to me.

Sincerely,

A handwritten signature in black ink, appearing to read "Henry Goldberg". The signature is fluid and cursive, with a long horizontal stroke at the end.

Henry Goldberg
Attorney for
Fantasma Networks, Inc.

Attachment

Proposed rules for early release of certain UWB devices.

Applies to frequencies above 1,100 MHz only.

- Operation (intentional radiation) only between 2,900 MHz and 4,990 MHz
- Intentional emissions limited to “Class B unintentional” levels (Section 15.209)
- Out-of-band emissions limited to 12 dB below in-band limit
- Indoor operation only
- Emission measurements consistent with present certification procedures
- No airborne operation permitted

Notes

This proposal intended to apply to frequencies above 1,100 MHz. No recommendation for lower frequencies.

Chosen to maximize protection for all GPS and GLONASS bands including 2005 new bands.

Lower limit selected to avoid Aeronautical Radio Navigation spectrum below 2,900 MHz.

Upper limit selected to avoid radio astronomy and MLS near 5,000 MHz.

Generally shares only with less-sensitive incumbents.

Indoor operation provides 10 dB or more additional interference protection. Intended to more than equal 6 dB differential between permitted Class A and Class B unintentional emissions.

Measurement procedure proposal reflects general preliminary findings that total power or spectral density probably not pertinent.

Airborne restriction intended to protect radio astronomy. Additional restrictions (e.g., geographical) may be imposed.