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ATTORNEYS AT LAW

8 May 2000

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RECEIVED  
MAY 08 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: *Ex Parte – ET Docket No. 98-153*  
*Ultra-Wideband*

Dear Ms. Salas:

On Friday, 5 May 2000, undersigned counsel for Time Domain Systems, Inc. contacted Ari Fitzgerald, Legal Advisor to Chairman Kennard, regarding the above-captioned matter. I argued that the pending NPRM in this matter should not be delayed because of concerns about GPS issues at the World Radio Conference (WRC).

More specifically, I pointed out that the U.S. position at WRC is to oppose any new allocation for MSS in 1559-1567 MHz band where GPS operates. I also pointed out that such an allocation is also opposed by CITELE, CEPT, APT, a group of African administrations, ICAO, IMO, and for good measure, Cuba. I argued, therefore, that there would be no serious attempt at WRC to put MSS in the GPS bands.

I argued that the only GPS controversy at WRC seems to be whether to eliminate Resolution 220 (calling for studies of MSS/GPS sharing) or to retain it for further studies. I pointed out that most of the significant parties (except CEPT) support eliminating the Resolution, and that even CEPT will support its elimination if a MSS downlink is added in the 1518-1525 MHz band.

In short, I argued that there is nothing of consequence at issue at WRC affecting GPS, and that delaying an NPRM on ultra-wideband technology due to the WRC is unnecessary.

Sincerely yours,

A handwritten signature in black ink that reads "SCOTT HARRIS". The signature is stylized with a large "S" and a small circle above the "I".

Scott Blake Harris

cc: Ari Fitzgerald

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