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8 May 2000

EX PARTE OR LATE FILED

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th 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 Commissioner Susan Ness and her legal advisor, Mark Schneider, 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 Blake Harris".

Scott Blake Harris

cc: Susan Ness
Mark D. Schneider

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