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August 31, 2000

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th St., S.W.  
Washington, DC 20554

RE: Ultra-Wideband ET Docket 98-153

Dear Ms. Salas:

The National Volunteer Fire Council (NVFC) is a non-profit membership association representing more than 800,000 members of America's volunteer fire, EMS, and rescue services. Organized in 1976, the NVFC serves as the voice of America's volunteer fire personnel who man over 28,000 stations across the country. On behalf of our membership, I write to urge the Federal Communications Commission ("FCC") to consider approval for the use of ultra wideband (UWB) technologies for the benefit of public safety personnel.

Last March, representatives of Time Domain Corporation, one of several companies in the UWB Working Group, hosted a demonstration of a see-through-walls radar product that used ultra-wideband technology. The product was able to identify motion on the other side of a solid wall and indicate the degree to which motion occurred. Although the technology remains at the early stages of development, we are very excited about its potential in the areas of public safety.

UWB also offers great promise in the area of tactical asset control and coordination. Time Domain's projected GeoTrack system is a wireless positioning and geolocation system that can locate and track personnel or equipment inside a building or finite space. The technology allows for real time tracking of people, animals or equipment inside a location -- within several inches -- by using a series of portable fixed antennas at a rescue scene and transmitters on rescue personnel. As the personnel move inside the facility, the fixed antennas track the relative location to each of the units. This application could be of enormous benefit to the leaders of rescue teams at disaster scenes.

Because of its unique properties, UWB offers significant promise in addressing not just the pressing need for tracking and location at the scene of incidents, it may also provide some relief

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from the congestion and lack of security that all too often plague emergency personnel in tactical situations. When firefighters and other emergency personnel converge on a major incident, we need reliable short range communications. To the extent that UWB can offer that capability, it would go a long way towards reducing the congestion that we now face, thereby freeing up our narrowband channels for longer range communications. We look forward to the day when one unit will combine narrowband land mobile communications, UWB ranging and tracking, and even GPS. We have heard of such capabilities being developed for the military. The FCC should encourage the development of such life-saving technology for use by paid and volunteer civilian emergency workers.

In conclusion, we believe that technological advancements in UWB could prove invaluable to the operations of fire departments nationwide. If rescue personnel and their assets could be tracked to within inches of their location, it would greatly enhance command and control of emergency environments. And this might only represent the tip of the iceberg in terms of what this technology can do.

We understand that this important technology must be approved pursuant to the FCC's rulemaking process before it may be made widely available. We urge the FCC to approve expeditiously the use of ultra-wideband technologies for the benefit of law enforcement and public safety departments across the country. This see-through-wall radar has the potential to produce enormous public safety benefits, and we can think of no better role for government at any level than to expedite the deployment of technologies that can save lives.

If you have any questions regarding this issue, please feel free to contact Craig Sharman, NVFC's Government Affairs Representative, at (202) 887-5700. We look forward to working with the FCC on this issue in the future.

Sincerely,



Fred G. Allinson  
Chairman

cc: NVFC Legislative Committee