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September 11, 2000

**EX PARTE**

Chairman William E. Kennard  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

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

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Dear Chairman Kennard:

I am writing to express the opposition of Fantasma Networks, Inc. ("Fantasma"), to the recent suggestion that the Commission extend the dates for comments and reply comments on the Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding, which addresses issues relating to ultra-wideband ("UWB") transmission systems.

Fantasma currently is developing UWB technologies for short-range wireless networking in homes, schools, and libraries. The company's technologies will enable low-cost, untethered broadband access for simultaneous video, audio, and Internet use throughout these areas without encumbering the increasingly scarce radio spectrum. The Commission's efforts to establish UWB rules as soon as possible, therefore, is of critical importance to Fantasma and to the public at large.

Comments on the UWB NPRM are due by September 12, 2000, and reply comments are due by October 12, 2000. In an *ex parte* letter filed August 30, 2000, Multispectral Solutions, Inc. ("MSSI") requested that the Commission extend these dates by approximately six months. While Fantasma is sympathetic to the request, time is of the essence with respect to this proceeding and, therefore, Fantasma reluctantly opposes such an extension.

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MSSI's request raises appropriate concerns since the technical data expected from NTIA's UWB tests will not be available to the Commission for a few more months. Although we will not have test results at the time initial comments and reply comments are due, there are a number of other issues raised in the NPRM that are unrelated to that test data (*e.g.*, measurement techniques). The Commission should begin to collect and analyze public comment regarding such issues and then, as the Commission has indicated it will do, make the test data available for additional public comment. While there is much merit in the MSSI request, the MSSI concerns will be addressed by the procedure the Commission intends to follow.

Fantasma therefore respectfully opposes the suggestion that the Commission extend the pleading cycle in this proceeding.

FANTASMA NETWORKS, INC.

By: /s/ James F. Lovette  
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