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Magalie Roman Salas,
Office of Secretary,
Federal Communications Commission

**Comment on ET Docket No. 98-153; FCC 00-163
“Revision of the Rules Regarding Ultra-Wideband Transmission Systems”**

Dear Magalie,

I offer the following comments on the revision of rules regarding ultra-wideband transmission systems.

The definition of UWB should not be limited to systems where the bandwidth is directly related to the narrow pulse width. Alternative radar modulation schemes may deliver better performance than pulse type modulation schemes and provided these meet the suggested FCC emission limits they should be allowed.

I am puzzled by the decision to impose a pulse emission limit (to be measured across a 50 MHz bandwidth) above 1 GHz and yet not impose a similar pulse emission limit below 1 GHz. Clearly wideband receivers are used below 1 GHz; the most well known are television receivers, CDMA mobile phones are another example. Perhaps a similar pulse emission limit should be applied below 1 GHz.

Marek Bialkowski
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