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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

THE ASSOCIATED GENERAL CONTRACTORS OF AMERICA

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September 12, 2000

Ms. Magalie Roma Salas
Secretary
Federal Communications Commission
455 12th Street, SW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

RE: Ultra-Wideband
ET Docket 98-153

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Dear Ms. Salas:

The Associated General Contractors of America (AGC) is interested in the possible application of ultra-wideband pulse radar technology within the construction industry. Founded in 1918, AGC is the nation's largest and oldest construction trade association. AGC represents more than 33,000 firms, including 7,500 of America's leading general contracting firms. AGC's general contractor members have more than 25,000 industry firms associated with them through a network of 101 AGC chapters. AGC member firms are engaged in the construction of the nation's commercial buildings, factories, warehouses, highways, bridges, airports, waterworks facilities, waste treatment facilities, dams, water conservation projects, defense facilities, multi-family housing projects, site preparation, and utilities installation for housing developments.

Because of the diversity of the construction trades industry, there are many occasions in which contractors can utilize ultra-wideband pulse radar technology. For example, renovation and rehabilitation of buildings requires an understanding of where building infrastructure is located. Older buildings do not always have accurate plans of their infrastructure. Ultra-wideband pulse radar technology can ensure that designated pipes and cables are where they are supposed to be. During historic renovations, the use of this technology can eliminate some of the more damaging aspects of renovation.

More and more utility infrastructure is found underground as well. Underground facility damage occurs when underground utility infrastructure facilities have not been accurately located. Often, contractors must hope that the underground utility locator has accurately pinpointed the location of the facility before work begins.

Possible applications of ultra-wideband pulse radar technology could be better identification of facilities, providing greater confidence that underground facilities have been accurately located.

The myriad applications of this technology have yet to be fully developed. Reasonable regulations should be implemented to encourage this technology to evolve. AGC urges the FCC to permit ultra-wideband pulse radar technology.

Sincerely

A handwritten signature in black ink that reads "Loren E. Sweatt". The signature is written in a cursive style with a long, sweeping horizontal line at the end.

Loren Sweatt
Director, Congressional Relations
Procurement and Environment