

Gerald H. Wright
Executive Vice President and
Chief Financial Officer

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September 11, 2000

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

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Re: Ultra-Wideband
ET Docket 98-153

Dear Ms. Salas:

I am writing you this letter today to provide you with our response to the FCC's Notice of Proposed Rulemaking (NPRM) on ultra-wideband (UWB) radio. By way of background, my name is Gerald Wright, and I am the Executive Vice President and Chief Financial Officer of Siemens Corporation.

We are writing in support of the proposed changes. We believe that there are many ways in which the UWB technology can be used and we are actively working to develop products using these technologies within Siemens. Our investigations lead us to believe that UWB technology can provide data bandwidth similar to other systems that are much larger, require far more power, or are an order of magnitude more expensive. These benefits naturally open the door to many products that were previously not feasible – for technological or cost reasons.

Examples of the current areas where we believe UWB could be significant to our businesses include the following:

Siemens Communications division

- Short range communications systems – including wireless LANs and wireless IP telephones,
- Dual mode mobile terminals – for cordless coverage in-building,
- Short range data telemetry.

Siemens Automotive & Drives division

- Road hazard identification – including collision avoidance radar,
- In-car communications – remote sensor control from a centralized point without wiring,
- Security systems

Siemens Medical division

- Very low power (safe) wireless patient monitoring and tracking devices.

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We believe that due to the extremely low power and the extremely wide range in which UWB systems operate, the above mentioned functionality can be deployed without any detrimental effect to the other users of those frequencies. In addition, the fact that such a system would not require licensed operation, nor would it require coordination with other unlicensed users of UWB products, would greatly facilitate and accelerate the marketability and attractiveness of these products.

We would like to encourage the FCC to move forward as quickly as possible in making a decision. Although we are actively exploring the feasibility of the above mentioned products and others, we can not move forward toward developing the products until we can be assured that they will meet Part 15 requirements and can be legally distributed and sold.

We realize that any operations under Part 15 of the Commission's Rules would be on the basis that no harmful interference is caused and that any received by a Part 15 device be accepted. As such, we understand that sensible regulations are necessary. We believe, harmful interference from UWB devices operating at levels equal to the general Part 15 limits that apply to computers and other digital devices is unlikely. We therefore would encourage that the maximum reasonable freedoms be given to such systems to encourage the further development of innovative and useful products.

Should you have any additional questions, or wish to discuss the topics outlined in this letter further, feel free to contact me directly at the number mentioned below, and I can put you in touch with the experts in our business who are investigating and developing such products.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerald Wright", written in a cursive style.

Gerald Wright
Executive Vice President and
Chief Financial Officer
Siemens Corporation