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September 22, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Room TW-A325
Washington, D.C. 20554

**Re: Revision of Part 15 – Ultra-Wideband Transmission Systems
(ET Docket No. 98-153)**

Dear Ms. Salas:

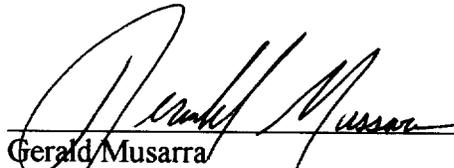
This letter is submitted by Lockheed Martin Corporation (“Lockheed Martin”), in advance of the Reply Comment deadline in this proceeding, for the purpose of clarifying Comments filed previously by Lockheed Martin-affiliated entities on September 7 and September 12, 2000. Lockheed Martin supports the Commission’s initiative in this docket, and believes that ultra-wideband technology may have significant applications for a variety of military, law enforcement and public safety uses. For example, as noted in the September 7 comments, UWB devices could provide substantially increased utility for some types of simulation and training technology systems, allowing operation at substantially reduced power, and producing significant operational cost savings.

At the same time, the Commission’s initial objective in this proceeding must be to determine how and in what portion of the spectrum UWB technology can be implemented, consistent with the agency’s obligation as a spectrum manager to ensure that existing services remain undisturbed. For this reason, while Lockheed Martin urges the Commission to move forward with the goal of permitting UWB applications where appropriate, it should only permit those uses that are shown through rigorous technical trials to operate without causing harmful interference to existing services. In this regard, the Commission should exercise particular caution with respect to public safety, restricted bands and other especially sensitive services that operate below about 3 GHz, ensuring, for example, the interference-free operation of GPS.

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Under any circumstance, sufficient time must be allowed for thorough testing before UWB service is permitted in these or any other bands. Nothing contained in prior filings by Lockheed Martin entities should be construed to undermine the company's fundamental position that final Commission actions in this proceeding must be premised on substantial and convincing technical data and its review.



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