

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

In the Matter of)
)
Revision of Part 15 of the) ET Docket 98-153
Commission's Rules)
Regarding Ultra-Wideband)
Transmission Systems)

Directed to: The Commission

COMMENTS IN SUPPORT OF MOTION FOR EXTENSION OF TIME

The Satellite Industry Association ("SIA") hereby respectfully supports the motion of Motorola, Inc. ("Motorola") for an extension of time until November 21, 2000, for all parties to submit reply comments in response to comments filed in response to the Commission's Notice of Proposed Rule Making ("NPRM") in the above-captioned proceeding.¹ In support, where of, the following is submitted:

SIA joins Motorola in urging the Commission to grant the requested extension, which is modest under the circumstances.

More than 130 parties filed comments in response to the NPRM, and nearly half of these contained highly technical comments and suggestions for regulatory proposals

¹ See *In the Matter of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems*, ET Docket No. 98-153, Notice of Proposed Rulemaking, 65 Fed. Reg. 27332 (June 14, 2000) ("NPRM").

that require careful consideration. Indeed, there are a number of areas where the technical comments filed significantly deviate from the Commission's NPRM as well as from each other, making the process of crafting replies complicated and time consuming. In particular, synthesis of the various comments on critical issues, including peak bandwidth measurement and methodologies for ensuring compliance with emission limits to be imposed will make it difficult for parties to prepare comments by the current deadline. Thus, the public interest will be served by granting the requested extension.

In addition, the extension requested should not cause undue delay to the implementation of Ultra-Wide Band ("UWB") technology. Many of the commenters from both sides of the issue urge the Commission to await the submission and consideration of test data before proceeding with any rules. Moreover, three of the principal proponents of UWB technology were granted conditional waivers that enable them to proceed with the limited marketing of devices containing UWB technology pending the outcome of the rulemaking proceeding. These proponents in particular, which include Time Domain Corporation, would appear not to be negatively affected by the grant of Motorola's requested extension. Operators of existing services, by contrast, stand to be seriously or even irreparably harmed if the Commission with establishment of UWB technology on the basis of an incomplete or flawed record.

Accordingly, good cause exists to grant the motion by Motorola and to extend the filing period for replies in this proceeding until November 21, 2000.

Respectfully submitted,

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September 28, 2000