Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

COMMENTS IN SUPPORT OF MOTION FOR EXTENSION OF TIME

Rockwell Collins, Inc. ("Rockwell Collins") a wholly-owned subsidiary of Rockwell International Corporation, hereby respectfully files in support of 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 the Commission's Notice of Proposed Rule Making ("NPRM") in the above-captioned proceeding.[1]

Rockwell Collins joins Motorola and the Satellite Industry Association (which filed comments on September 28, 2000 in support of Motorola's Motion for Extension of Time) in urging the Commission to grant the requested extension.

The complexity of ultra-wideband ("UWB") technology and the extensive analysis required to provide both the Commission and the public with a thorough and reasoned understanding of UWB's effects upon other services will be best served by providing the extension of time requested by Motorola. Well over 100 comments were filed in response to the NPRM. Many of these contained highly technical information and posed a number of important questions which will require significant analysis to fully understand and interpret.

---

[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. 37332 (June 14, 2000) ("NPRM").

It is in the public interest to grant the requested extension so that all questions surrounding the use of UWB devises and their potential for interference with safety of life and other GPS services are fully explored and answered. Only by having a full and complete analysis of the complex engineering concepts advanced in the Comments filed can interested parties prepare reply comments that will provide the Commission with the information it needs to make a sound decision in the above Docket. Granting the requested extension will, therefore serve the public interest and not unduly delay the implementation of a UWB rulemaking.

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,

ROCKWELL COLLINS, INC.

By: _____

Linda C. Sadler
Director, Governmental and
Regulatory Affairs
1300 Wilson Blvd
Suite 200
Arlington, VA 22209
703-516-8200
lcsadler@collins.rockwell.com