

RE: USE OF ULTRA-WIDEBAND TECHNOLOGY ET DOCKET NO. 98-153

I am the satellite navigation (SatNav) program manager at NAV CANADA, the company providing air navigation and air traffic services in Canada. NAV CANADA essentially provides the same air navigation services provided by the FAA in the USA.

My office has been working with the FAA since 1991 to bring the benefits of GPS technology to civil aviation in North America and around the world. This technology is a critical element as we modernize communications, navigation, surveillance and air traffic management systems to increase airspace capacity, reduce delays and inconvenience to users and enhance the safety of aircraft operations.

Our main concern as we move forward is interference, either intentional or unintentional, with GPS signals. Through a concerted effort by the aviation community at WRC-2000, SatNav frequencies were protected. We now understand that the FCC is considering the approval of the use of UWB devices. Based on information provided at the recent Institute of Navigation GPS-2000 meeting, we believe that UWB devices may be able to co-exist with SatNav, but that there are sufficient serious doubts to warrant an exhaustive study before any decision is taken on the use of new products incorporating UWB technology.

I would therefore urge the FCC to ensure that such studies are completed, otherwise the world's aviation community will lose a unique opportunity to meet the challenges of increased traffic, increased delays and gridlock that has severe adverse effects on the air transportation system.

Thank you for the opportunity to comment.

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