

Before the
Federal Communications Commission
Washington, DC 20554

In the matter of]	
]	
Revision of Part 15 of the Commission's]	Docket No. ET 98-153
Rules Regarding Ultra-Wideband]	
Transmission Systems]	

**REPLY COMMENTS OF
NATIONAL SPECTRUM MANAGERS ASSOCIATION**

The National Spectrum Managers Association ["NSMA" or "Association"]¹ respectfully submits the following Reply Comments in the above-captioned proceeding.

While the NSMA recognizes that Ultra-Wideband Transmission Systems [UWB] will potentially provide for an efficient spectrum utilization for communications needs as well as other innovative purposes, it is concerned that the unlicensed use of UWB

¹ The NSMA, established in 1984, is a voluntary association of individuals involved in the frequency coordination of terrestrial microwave, PCS, and satellite earth stations. The role of the Association is to supplement the Commission's coordination rules with procedural and technical recommendations developed in an open industry forum of coordinators, licensees, and manufacturers. The NSMA's objective is to make the frequency coordination process more efficient and effective.

devices could potentially cause harmful interference to critical existing and proposed communications services.

The NSMA agrees with the comments of Lucent Technologies, Nortel Networks, and Sprint that the Commission should not amend its Rules until the public and the Commission have both had a chance to thoroughly review the results of appropriate and thorough interference studies. In particular, these interference studies should consider both peak and average RF emissions, so that appropriate limits may be recommended, and take into account the cumulative effect of multiple UWB devices on both fixed and mobile wide band communications systems. Interference to licensed services supporting safety-of-life and emergency response, such as aviation systems and GPS, should receive especially careful analysis.

Comprehensive testing is a necessary adjunct to theoretical studies and the Commission should not amend its Rules until the studies have been completed and the public has been afforded an opportunity to comment on the tests and analyses.

To facilitate the evaluation of the testing, requests by those applying for Special Temporary Authority, such as Time Domain Corporation, for the purposes of conducting tests should have their requests placed on Public Notice by the Commission to allow for full evaluation of the potential for interference to licensed incumbent systems.

A full evaluation of the potential for harmful interference must be completed satisfactorily prior to revision of the rules and deployment of UWB devices.

Respectfully submitted,
NATIONAL SPECTRUM MANAGERS ASSOCIATION

By:

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October 27, 2000