

Before the
Federal Communications Commission
Washington, DC 20554

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

REPLY COMMENTS OF LUCENT TECHNOLOGIES INC.

Lucent Technologies Inc. (Lucent) respectfully submits the following reply comments in response to the Commission's *Notice of Proposed Rulemaking* (Notice),¹ regarding ultra-wideband (UWB) technologies. Lucent reiterates its support for the Commission's investigation into the establishment of new rules for UWB devices and its proposed methods for reducing interference levels.

While we share commenters' concerns that UWB rules must be designed to minimize interference to existing users, Lucent does not believe that significant delays in this proceeding are necessary. The Commission can address valid interference issues through adoption of the peak and average power limits, test methodology, and other recommendations, such as easily measurable performance criteria, discussed in our previously filed comments.² Lucent is confident that prudent, operational requirements for UWB devices, along the lines of those proposed in the Notice, will serve the public

¹ In the Matter of Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems, ET Docket 98-153, FCC 00-163 (rel. May 11, 2000).

² See Lucent comments.

interest by allowing the development of this new technology without unduly harming other spectrum users.

Lucent also believes that the Commission's proposal to adopt an unlicensed regulatory regime for low power UWB devices constitutes a reasonable approach, considering that the target market for such devices will likely be low power, short range, communications devices focusing on consumer and enterprise applications.

Thus, Lucent urges the Commission to proceed in a prudent, but expeditious, manner with the formulation of rules permitting the deployment of low power unlicensed UWB devices.

Respectfully submitted,

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By _____

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