

October 24, 2000

Magalie Roman Salas
Secretary, FCC
455 12th St., SW
Washington, DC 20554

Re: Ultra-Wideband (ET Docket 98-153)

Dear Ms. Salas,

On January 4, 1999, the Community Technology Centers' Network (CTCNet) first filed with the FCC comments regarding revision of Part 15 of the Commission's Rules regarding ultra-wideband transmission systems (Docket 98-153). As noted at that time, CTCNet is a network of organizations, mostly in low-income communities, where people get access to computers and computer-related technology, such as the Internet, together with classes and/or informal learning opportunities where skills can be developed and utilized (<http://www.ctcnet.org>).

CTCNet's approximately 450 nonprofit member organizations include multiservice agencies, community networks, adult literacy programs, job training and entrepreneurship programs, public housing facilities, public libraries, schools, cable television access centers, and after-school programs, each with its own technology and public policy programs. They are located in both urban and rural areas of 43 states and the District of Columbia.

In our previous filing we noted a range of advances to public health and safety that could be expected to result from the development and deployment of ultra-wideband devices. Since that filing, we have been especially encouraged to see a variety of comments that have focused particular attention on the potential for UWB to enable low-cost, high-speed, unlicensed wireless devices for local area networking (see, e.g., the comments submitted by The Council of Chief State School Officers; The Rainbow/PUSH Coalition; American Telemedicine Assoc.; Consortium for School Networking; Disability Rights Education and Defense Fund, Inc.; National Catholic Educational Association; and the American Association of People with Disabilities.)

As noted in some of those comments, the beneficial results can include creation of "wirelessly networked smart homes that help people with disabilities to live independently." And UWB wireless LANs can, in schools, offer increased flexibility while obviating renovations that might be difficult and expensive particularly where there is asbestos. Such benefits of wireless LANs can even more dramatically benefit the wide variety of community technology centers that are not in schools or libraries and that are ineligible for the federal e-rate discounts on internal wiring. For some multiservice agencies in old structures, the cost of establishing a wired network is a major hurdle that substantially interferes with creation of a computer center. A great benefit of a wireless solution is that it can flexibly utilize limited space so that it can be shared with other uses. Programmatically, it creates benefits for program participants

involved in project-based learning to be able to group and-re-group in clusters not restricted by fixed computer locations. While wireless solutions currently exist, it appears that UWB solutions may help lower costs while increasing access speeds.

For reasons such as these, we continue to applaud the FCCs examination of possible revisions to Part 15, and hope that the result will be proposed rules facilitating the development and deployment of UWB devices.

Sincerely,
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Community Technology Centers' Network (CTCNet)

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