

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

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

To: The Commission

REPLY COMMENTS OF NOVATEL INC.

NovAtel Inc. ("NovAtel"), pursuant to Section 1.415 of the Commission's Rules, 47 C.F.R. ? 1.415, hereby submits our Reply Comments in connection with the Commission's Notice of Proposed Rule Making ("NPRM") in the above-captioned proceeding. NovAtel supports the U.S. GPS Industry Council who submitted detailed comments in response to the NPRM on September 12, 2000.

NovAtel feels especially compelled to submit comments on this proposed rule-making since we were only recently asked to submit hardware for testing by the National Telecommunications Information Administration (NTIA) of the potential for UWB interference to GPS. As a result of this request, received only in late September 2000, we prepared requested hardware for the NTIA which has been ready and available since the beginning of October. However, since this time, the NTIA has failed to respond to our repeated attempts to communication with them about the delivery of this hardware. Consequently, serious concerns have been raised about the test program and its utility as a basis for a way forward for rule-making. We are working with the U.S. GPS Industry Council and other industry representatives and have contacted the Government of Canada through Industry Canada to pursue these concerns.

We understand and appreciate the time constraints in this matter, however, the testing proposed can in no way be described as comprehensive. One of the issues identified in our preliminary investigation of this matter is the limited testing undertaken is the reliance on average power as opposed to peak power, thus significantly understating the potential for interference. In addition, given the uniqueness of each UWB waveform there are concerns that only a limited number of waveforms are being tested. The U.S. GPS Industry Council requested that additional GPS performance characteristics important to the installed base be monitored in these tests yet we have not seen evidence that this is being done. NovAtel shares concerns that have been expressed about ensuring that appropriate instrumentation is used to monitor UWB devices, including the ability to adequately measure composite energy from networked UWB devices. We believe that comprehensive testing cannot be completed without a careful study of densely networked UWB transmitters. We are very disturbed by evidence that we have seen which shows that transmitted UWB waveforms can be very unstable due to effects on the antenna.

Consequently, we see no way that the current test program can be considered comprehensive or adequate to determine UWB characteristics that would not interfere with GPS to allow communications transmissions to operate in frequency bands restricted by the International Telecommunications Union for safety-of-life services. This is of particular concern to NovAtel as we supply

GPS receivers for the United States Wide Area Augmentation System (WAAS) and similar systems worldwide (Japan, China and Europe). We are also developing GPS receivers for the Local Area Augmentation System (LAAS) also being developed by the Federal Aviation Administration.

NovAtel is concerned that such a serious matter is not being given due attention. As we learn more about the issues, it is very clear that the stakes are very high. The NTIA and others felt it appropriate that NovAtel hardware be included in testing that needs to be done. We agree with this decision and welcome the opportunity to participate in rational comprehensive testing. Spectrum management, safety-of-life services demand thorough analysis. We trust that prudent risk management will be applied to this issue.

Respectfully submitted,

By: _____
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Senior Vice President Corporate

Affairs

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