



**Aerospace
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October 27, 2000

Magalie Roman Salas, Commission Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

re: ET Docket No. 98-153 [FCC 00-163]

ref: Revision of the Rules Regarding Ultra-Wideband Transmission Systems

The Aerospace Industries Association recognizes that Ultra-Wideband (UWB) devices offer significant benefits for public safety, business and consumers. Notwithstanding the perceived need to move forward the regulatory process enabling deployment of UWB technology, AIA is greatly concerned that safety-of-life services such as use of the Global Positioning System in aviation are protected against harmful interference from UWB devices.

Significant testing is currently being conducted that would address the outstanding interference questions surrounding UWB technology and devices. This testing will not be completed, however, within the time constraints of this NPRM.

AIA believes it necessary for this testing be completed before the current regulatory process moves forward in order to insure non-interference with safety-of-life services. The Aerospace Industries Association therefore urges the Federal Communication Commission to extend the filing deadline for testing and analysis data from 120 days until February 27, 2001.

Sincerely,

Howard Aylesworth, Jr.
Director, Air Traffic Systems and
Aircraft Noise and Emissions

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