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Consumer Federation of America

**Consumers
Union**

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Margalie Roman Salas
Secretary, Federal Communications Commission
445 12th St., SW
Room TW-204-B
Washington, DC 20554

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Proceeding No. 98-153

Dear Secretary Salas:

We are writing to you on behalf of Consumers Union¹ and the Consumer Federation of America (CFA)² in reference to the Commission's rulemaking on ultra wideband (UWB) technology. Based on the initial comments to the Commission, we believe that UWB technology may offer great potential benefit to consumers in the areas of communications, medicine, and public safety. While we recognize and support the Commission's important role in ensuring public safety, we wonder whether many of the safety and interference concerns expressed during the initial comment period were motivated by a fear of competition by "legacy" industries, rather than by an authentic concern for public safety.

We believe that UWB technology has the potential to enable a wide range of new services that may have significant consumer benefits. In addition to applications in areas

¹ Consumers Union is a nonprofit membership organization chartered in 1936 under the laws of the State of New York to provide consumers with information, education and counsel about goods, services, health, and personal finance; and to initiate and cooperate with individual and group efforts to maintain and enhance the quality of life for consumers. Consumers Union's income is solely derived from the sale of *Consumer Reports*, its other publications and from noncommercial contributions, grants and fees. In addition to reports on Consumers Union's own product testing, *Consumer Reports* with approximately 4.5 million paid circulation, regularly, carries articles on health, product safety, marketplace economics and legislative, judicial and regulatory actions which affect consumer welfare. Consumers Union's publications carry no advertising and receive no commercial support.

² The Consumer Federation of America is the nation's largest consumer advocacy group, composed of over two hundred and forty state and local affiliates representing consumer, senior, citizen, low-income, labor, farm, public power and cooperative organizations, with more than fifty million individual members.

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such as senior care, home safety and rescue operations, we see the potential for an entirely new "last mile" competitor in UWB. Commenters discuss several ways that UWB could help to spur competition, lower prices and bring better service to customers. According to one commenter with experience in technology venture capital, "UWB allows for wireless networks to bring high-speed Internet access, voice and data transmission as a means for their services."³ Another commenter noted that "without placing additional demands on spectrum, UWB technologies can increase the supply of communications services available to the public UWB is a once-in-a-generation chance to narrow the gap between the bandwidth 'haves' and 'have-nots'."⁴

In recent years, Consumers Union and CFA have noted that further study is warranted to evaluate the possible health effects of cellular telephones and other high-powered radio wave emitters. If UWB does indeed offer the possibility of wireless communication and data transmission at a fraction of current power levels, we believe that this technology should be explored expeditiously.

While we share some commenters' concerns about interference with certain kinds of navigation equipment, we believe that the proper response should be rapid, coordinated testing of UWB, not unnecessary delay. We hope the Commission will continue to act quickly in this matter.

Sincerely,



Gene Kimmelman
Co-Director, Washington Office
Consumers Union



Mark Cooper
Research Director
Consumer Federation of America

³ Comments of Staenberg Private Capital LLC (Seattle, Washington).

⁴ Comments of Fantasma Networks, Inc.