

The NTIA Report 01-43 "Assessment of compatibility between ultrawideband devices and selected federal systems" does not address the issues associated with UWB ground penetrating radar systems. These GPR systems are typically not 2 or 20 meters above the ground as the UWB systems tested in the report, but are at zero height in ground contact and using ground coupled antennas. The results for such systems will be very different than for other UWB devices with antennas at some height in the air above the ground. Also systems with ground coupled antennas have properties and behavior that vary with the properties of the ground, which can change considerably in space and time (wet-dry soil, freeze-thaw, etc.).