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March 12, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington D.C., 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: ET Docket 98-153 /

I am writing on behalf of the Computer & Communication Industry Association (CCIA) in reply to the request for comments on test data submitted by NTIA regarding potential interference to selected federal systems from ultra-wideband (UWB) transmission systems.

CCIA is an international association of technology, telecommunications, and Internet firms, representing a broad cross section of the industry. Our members employ nearly a million workers and generate annual revenues in excess of \$300 billion. CCIA and its members are dedicated to fostering new developments within the technology and telecommunications industries and to this end I hope our comments are helpful to you in the decision making process. We work to promote open markets, open systems, open networks and full, fair and open competition.

CCIA believes that NTIA's approach, receiver protection criteria, analysis and recommendations are solely lacking and failing to consider "real world" effects that can be shown to significantly alter the conclusions of the NTIA. If the NTIA's methodology were extended to all unlicensed electronic devices, including computers, personal digital assistants and cordless phone receivers, it is likely that none of these devices would be permitted. If the FCC adopts NTIA's analysis and recommendations for UWB, it will set a precedent that could have the effect of preventing the introduction of future innovative technologies, and may even restrict the continued operation of today's communications technologies. CCIA finds this possibility most alarming, and urges the FCC not to adopt this dangerous approach.

The NTIA report explicitly recognizes that it did not consider numerous "real world" mitigating factors in its analysis, and there are other factors that NTIA did not cite but would further improve the accuracy of its analysis if considered. These factors include but are not limited to: the presence of buildings, foliage, hills and trees; the consideration of a propagation model that takes urban/suburban effects into account; already existing levels of ambient noise; and realistic UWB antenna orientations and operational properties of the federal systems studied.

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We believe that the NTIA non-GPS report, when analyzed taking these “real world” mitigating factors into account, shows that UWB can be safely deployed without any risk of harmful interference to approved systems, and that all of NTIA’s recommended constraints on the operation of UWB are unnecessary. We urge the FCC to move forward promptly with its rulemaking so that the numerous benefits of this exciting new technology can be realized.

CCIA does not agree with some of the respondents in this proceeding who believe that further testing needs to be done before this technology can be deployed, and believe the NTIA non-GPS results (along with the GPS test results) provide sufficient data on which to base rulemaking decisions.

Our member companies are excited about the many commercial and public safety applications of UWB technology. We urge the FCC to move forward with its rulemaking as expeditiously as possible, and without adopting NTIA’s unrealistic model, in order to ensure that this technology can achieve its full potential and that the introduction of future technologies can proceed without burdensome and unnecessary operational constraints.

Sincerely,

A handwritten signature in black ink that reads "Ed Black". The signature is written in a cursive, flowing style.

Ed Black
President and CEO