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Air Transport Association of America, Inc. · Aircraft Owners and Pilots Association
ARINC · ARRL, The National Assoc. for Amateur Radio · Astrolink International
AT&T Wireless Services, Inc. · Ellipso, Inc. · Ericsson Inc · Garmin International, Inc.
General Aviation Manufacturers Association · LocatorNet · Lockheed Martin Corporation
Magellan Corporation · Motorola, Inc. · National Business Aviation Association
Nokia, Inc. · Nortel Networks, Inc. · Omnistar, Inc. · Outreach
QUALCOMM Incorporated · Rockwell Collins · Satellite Industry Association
SiRF Technology · Sirius Satellite Radio · Spatial Technologies Industry Association
Sprint Corporation · Trimble Navigation Ltd. · US GPS Industry Council
WorldCom, Inc. · XM Radio Inc.

June 6, 2001

VIA MESSENGER

RECEIVED

JUN 6 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Michael K. Powell
Chairman
Federal Communications Commission
The Portals
445 Twelfth St., SW
Washington, DC 20554

Re: ET Docket 98-153

Dear Mr. Chairman,:

Members of the UWB coalition met with you on May 30 to discuss matters raised in the joint ex parte letter to you filed on May 18, 2001 on behalf of 30 parties.[1] At that meeting, the coalition indicated that we would submit a more detailed summary of the views of the coalition as expressed at the meeting.

We identified three principal issues that needed to be addressed: (i) while ultra-wide band (UWB) devices provide promise for many services, tests by several government agencies and a broad range of industry have shown that these devices cause significant harmful interference with authorized spectrum users in the 1 to 6 GHz band, and, therefore, the Commission cannot overlay UWB in these bands under existing FCC Part 15 rules; (ii) the NPRM is deficient in that it contains only a single paragraph on the potential use of UWB devices in overlapping network communications; consequently the majority of testing to date focussed on an overly narrow interference profile; and (iii) the threat to the noise floor of unlicensed operations in the relevant spectrum needs to be carefully evaluated.

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[1] See Notice of Ex Parte Presentation, ET Docket 98-153, May 31, 2001.

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In response to your question about test results, members of our group enumerated the tests in the record to this proceeding that demonstrated UWB interference. We also briefly described the type of spectrum arrangements that would be necessary to permit the orderly use of UWB communications devices, which would require as a minimum an active frequency manager for the segment of spectrum allocated to UWB above 6 GHz.

We further suggested the following elements of a proposed solution: (i) the Commission should identify specific categories of UWB devices and establish proposed rules for licensing these categories;[2] (ii) the Commission should identify spectrum above 6 GHz, other than spectrum in restricted bands, where UWB devices can be used without creating harmful interference to spectrum users; (iii) the Commission should codify the existing UWB ground penetrating radar application below 1 GHz with licensing rules appropriate to unintended emissions; (iv) the Commission should study the issue of the noise floor increase by UWB devices over the relevant spectrum; and (v) the Commission's proposed rules for each UWB category should be incorporated into a licensing scheme, and not Part 15, and industry members should be given an opportunity to comment on the Commission's proposed rules and regulatory framework prior to their adoption. We believe that this proposed solution would not result in significant delay to implementation of most UWB categories.

In the event there are any questions concerning our presentation, please feel free to contact me. An original and one copy of this letter are submitted for inclusion in the record of the above-referenced proceeding.

Sincerely,

Robert D. Briskman

Robert D. Briskman
On behalf of the parties listed above

cc: Peter Tenhula
Ms. Magalie R. Salas, Secretary

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[2] The following UWB categories were suggested: Communications; Ground Penetrating Radars, Automotive Collision Radars, and Experimental Devices.