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TIME DOMAIN
THE PULSE OF THE FUTURE

Time Domain Corporation
1666 K Street, N.W.
Suite 250
Washington, D.C. 20006

RECEIVED

June 28, 2001

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VIA COURIER

EX PARTE OR LATE FILED FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W. TW-A325
Washington, DC 20554

Re: Ex Parte Notification and Summary, Revision of Part 15 of the Commission's Rules
Regarding Ultra-Wideband Transmission Systems, ET Docket No. 98-153

Dear Ms. Salas:

On June 12, 2001 the undersigned had a telephone conversation with John Reed of the Office of Engineering and Technology. We discussed issues related to the design of UWB transmissions such that the signals appear noise-like to a GPS receiver. I stated that only the studies that focused on GPS reception showed explicit sensitivity to UWB emissions that had significant spectral line features, and that while these studies showed that GPS signals are more susceptible to CW-like emissions than to those that are white-noise-like, that there has been nothing submitted to the FCC record that shows a sensitivity of any other system to CW-like UWB emissions besides GPS.

Time Domain agrees that the Commission could accord an extra measure of protection to GPS beyond that proposed in the NPRM by requiring that CW-like UWB signals falling into the L₁ GPS band be attenuated by an additional amount, but does not believe that there is a basis for extending this requirement to any other part of the spectrum. For example, a requirement for an additional 20 dB of attenuation of spectral features across the entire UWB spectrum is not only unsupported by any test data submitted to the docket, it also presents a formidable engineering challenge to UWB manufacturers. Time Domain continues to plan to submit more specific technical information on this topic at a later date.

Pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. §1.1206, an original and a copy of this letter have been submitted for inclusion in the public record. Please contact me at the phone number listed above if you have any questions concerning this letter.

Sincerely,



Michal Freedhoff

cc Mr. John Reed, Office of Engineering and Technology

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www.timedomain.com
phone 1.202.835.3001
fax 1.202.835.3008
1.888.826.8378

