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OFFICE OF THE SECRETARY

September 27, 2001

NATIONAL OCEAN INDUSTRIES ASSOCIATION

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Ms. Magalie Salas, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte* presentation ET Docket No. 98-153 – Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems

Dear Ms. Salas:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, on behalf of National Ocean Industries Association, I am filing this letter to report an oral *ex parte* communication in the above referenced proceeding.

Yesterday, Raul Rodriguez of Leventhal, Senter & Lerman P.L.L.C, and Amy Mehlman of Capitol Coalitions, Inc. and Jeannie Mills and I of NOIA met with Peter Tenhula to discuss the potential significant impact the proposed changes to the Commission Rules regarding ultra-wideband technologies would have on the domestic offshore oil and gas industry and domestic energy production. A copy of our presentation to Mr. Tenhula is enclosed.

If there are any questions about this submission, please call me at the number below.

Sincerely yours,
Mr. Bob Moran

Director of Government Affairs
National Ocean Industries Association

cc: Peter Tenhula

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List A B C D E

The Domestic Offshore Energy Industry's Position on Ultra Wide Bandwidth

September 26, 2001

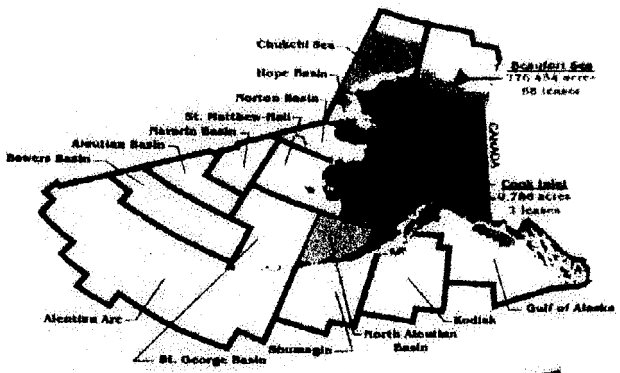
Robert Moran
National Ocean Industries Association

National Ocean Industries Association

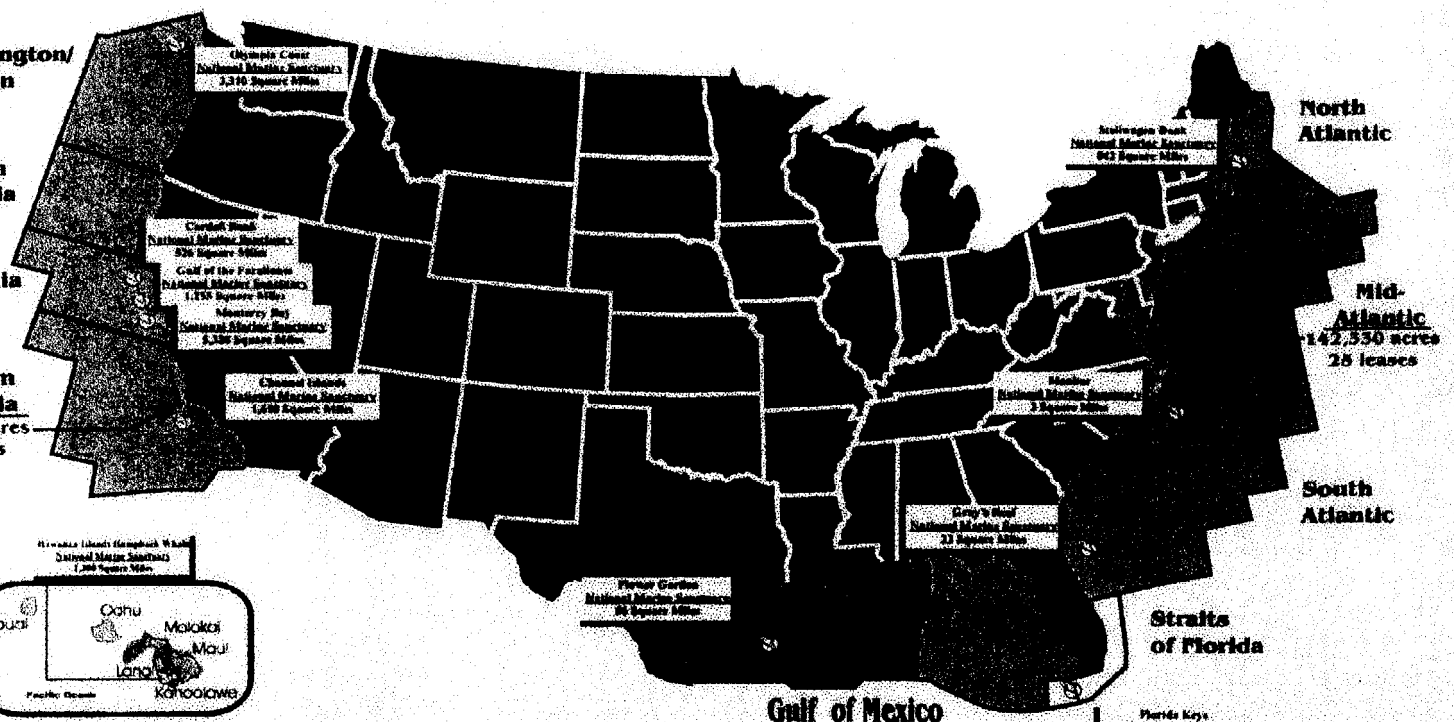
- Over 300 Member Companies
- All Sectors of the Outer Continental Shelf Oil and Gas Exploration & Production Industry
  - Significant Contributor to Domestic Energy Production
  - One of Federal Government's Largest Sources of Non-Tax Income
  - Operations Demand Safety-Critical Emergency Communications, Precise Positioning, Data and Voice Communication Services

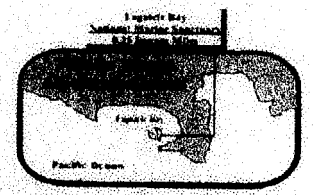
MMS U.S. DEPARTMENT OF THE INTERIOR MINERALS MANAGEMENT SERVICE

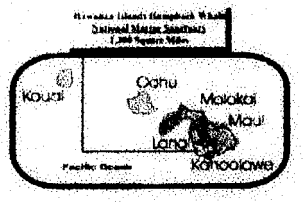
Status of Federal OCS Leasing Program



Note:
On June 12, 1998, the President withdrew from new oil and gas leasing through June 30, 2012, certain areas of the Outer Continental Shelf -- i.e., those areas included in the Department of the Interior's Fiscal Year 1998 Appropriations Act (P.L. 105-83). The President also prohibited new oil and gas leasing indefinitely in existing National Marine Sanctuaries. The President's withdrawal does not affect existing OCS leases.







Legend

- Planning Area Boundaries
- Areas Withdrawn from Leasing through June 30, 2012
- Areas neither covered by President Clinton's withdrawal directive nor considered for leasing during the current, 1997-2002, OCS 5-Year Oil and Gas Leasing Program
- Existing Leases as of 6/30/98
- Areas Available for Leasing in current, 1997-2002, 5-Year Oil and Gas Leasing Program
- National Marine Sanctuary

June 1998

OCS Oil and Natural Gas Industry Facts

- Significant Contributor to Domestic Energy Production
- Second Largest Source of Federal Revenue
- Global Leader in Advanced Ocean Technologies

Domestic Energy Production

- 27% of domestic natural gas production
- 25% of domestic oil production
- On a per day basis, OCS produces about:
  - 13.9 bcf (billion cubic feet) natural gas
  - 1.3 MMbbls (million barrels) oil
- U.S. imports in July 2000 were 11.1 MMbbls/day
- Energy is the fuel that drives our economy. Every 2% growth in GDP requires an almost 1% growth in energy usage
-

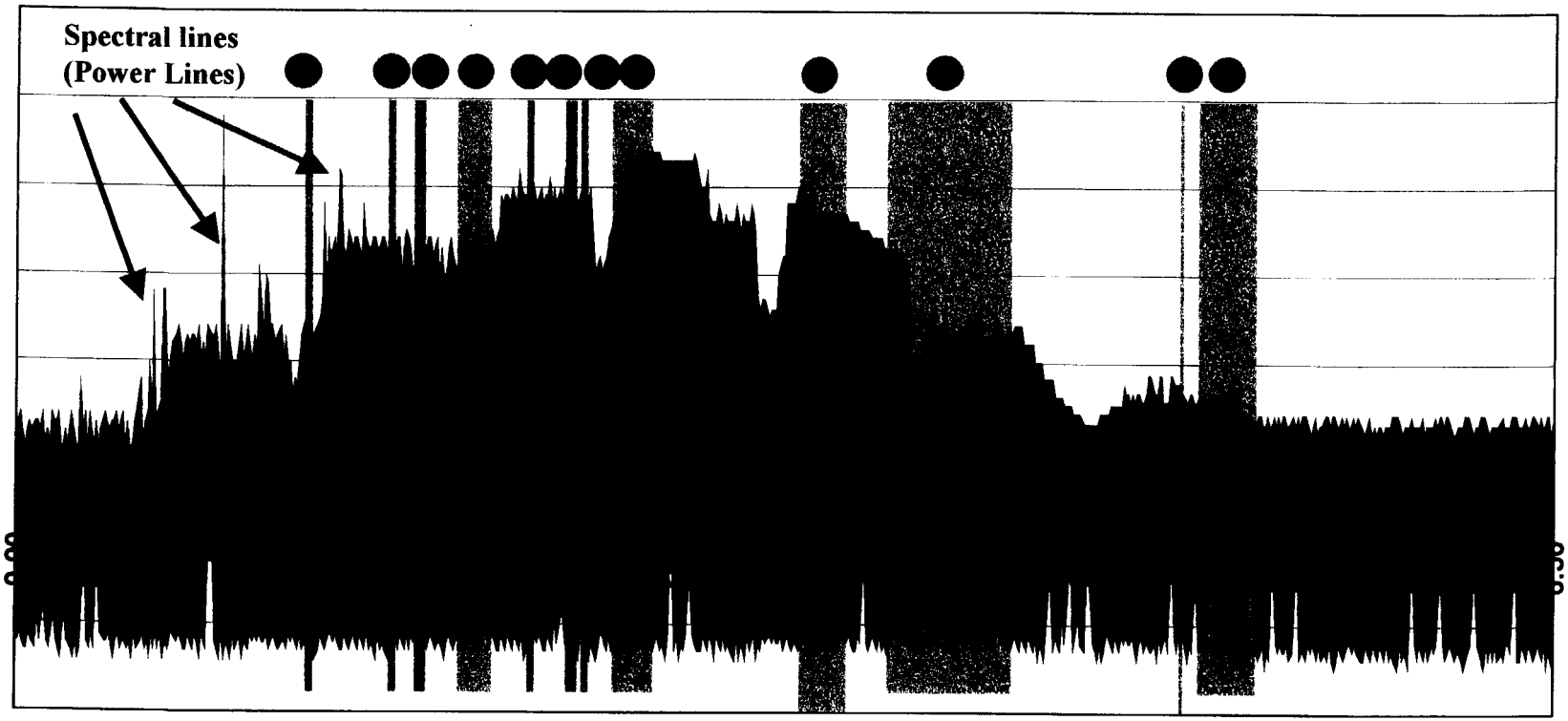
Federal Revenues

- On average $5 Billion to Treasury from OCS Leases annually– Treasury, LWCF and State Grants
- OCS industry and shore sector provide ~ 85,000 jobs
- GOM producing companies spend an estimated $6 billion with vendors.

UWB Impacts on Critical Offshore Energy Communications Requirements

- Maritime Safety is Paramount
- Precise Positioning Services DGPS
  - Navigation (air and sea)
  - Offshore Construction
  - Subsea Operations
- Data Streaming
  - Geophysical Operations
  - Remote Operations (SCADA)
- Wireless Communications

Frequency Spectrum of a Sample UWB Signal (Centered on 3.25 GHz)

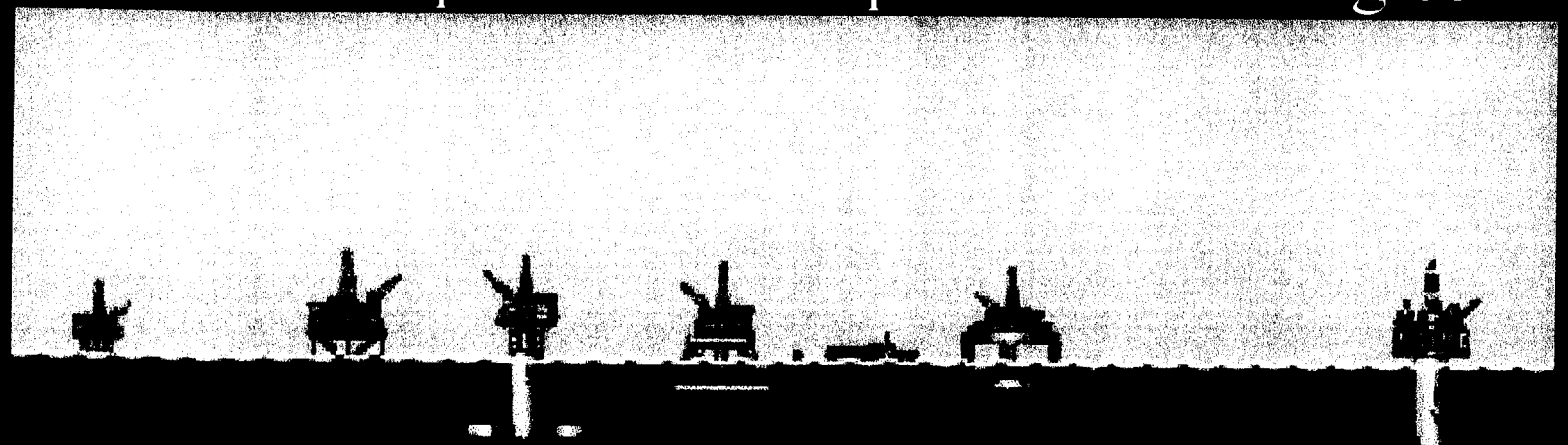


A sample of services affected by this UWB signal

1. Global Positioning System (GPS) (L2)
2. Global Positioning System (GPS) (L1)
3. Meteorological satellite
4. Personal communication services (PCS) (12 segments, 5 and 15 MHz each)
5. Point-to-point microwave (base station connections for cell phones)
6. Digital Audio Radio Services (DARS)
7. Amateur radio service; "data PCS" (Part 15 devices, for example wireless LAN systems)
8. "Wireless cable" services: MMDs, closed circuit educational TV (33 channels)
9. Amateur Radio Service
10. C-Band (downlink): Satellite TV
11. Radio Astronomy (Space Research)
12. Aviation: Microwave Landing System

Source: M. Luo et al. *Precision Interference to GPS from UWB Transmitters: Test Results*, FT Docket No. 98-153 (October 26, 2000) (Stanford University test sponsored by DOT)

OCS Deepwater Development Technologies



Fixed Platform (FP) (To 1500 Ft)

Compliant Tower (CT) (1500 to 3000 Ft)

Sea Star (SStar) (500 to 3500 Ft)

Floating Production Systems (FPS) (1500 to 6000 Ft)

Tension Leg Platform (TLP) (1500 to 7000 Ft)

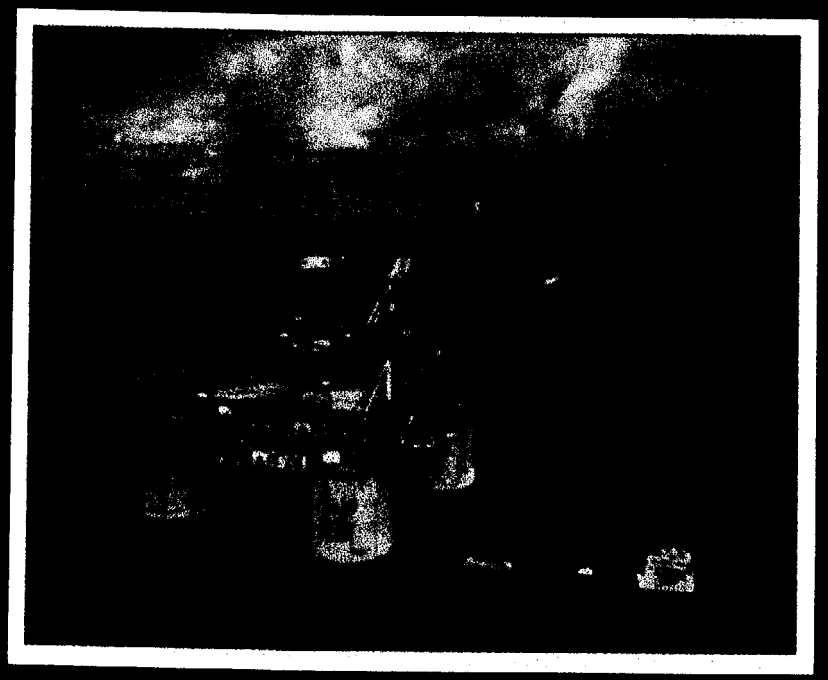
Subsea System (SS) (To 7000 Ft)

SPAR Platform (SP) (2000 to 10000 Ft)

Discoverer Enterprise

- The *Discoverer Enterprise* of Transocean Sedco Forex is the only ultra-deep drillship with dual activity drilling technology. It can drill, test and complete wells in water depths of up to 10,000 feet
  - 835 ft long and 418 ft in height
  - Constructed with more than 75 million pounds of steel
  - Capable of generating almost 40 megawatts of power (enough for 40,000 homes)
  - About 1,600 miles of cable and wiring run through Discoverer Enterprise (approx. distance from Houston to New York)
  - Living Quarters can accommodate up to 200 people

URSA Tension Leg Platform



- The Shell operated Ursa tension leg platform is located in 3,800 feet of water at Mississippi Canyon Block 809, approximately 130 miles southeast of New Orleans.
  - Leases acquired 1983, 1984 and 1988
  - Total project cost (excluding lease costs) is approx. $1.45 billion
  - TLP fabrication began in July 1996 and completed in June 1998
  - Total steel weight – 63,300 tons
  - Designed to simultaneously withstand hurricane force waves and winds.
  - Facility designed to process 150,000 barrels of oil and condensate/ day, plus 400 million cubic feet of gas/day

Bush Administration
Executive Order 13211

Executive Order 13211 – agencies "to minimize the adverse effect of regulatory actions on energy supply" including adverse material affects on productivity, competition, jobs or prices in the energy sector."

NOIA Opposes Overlay of UWB on Existing Services

- UWB interference with OCS industry's safety-critical communications is unacceptable
- UWB interference with integrity of GPS system would have material adverse effect on domestic energy production

NOIA
Mission Statement

NOIA's mission is to secure reliable access to the nations valuable offshore hydrocarbon resources in order that they may be developed, produced and supplied in an environmentally responsible manner.