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November 13, 2001

The Honorable Michael Powell
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Approval of Ultra-Wideband Technology Deployment (ET Docket No. 98-153)

Dear Chairman Powell:

I am writing to reaffirm and elaborate the views expressed in Sony Corporation's earlier letter, dated September 8, 2000, regarding the Federal Communications Commission's notice of proposed rulemaking on ultra-wideband (UWB) technology.

Sony Corporation develops and manufactures a wide range of consumer and professional electronic products with wireless communication capabilities. These products provide individuals with great flexibility and satisfaction in using multimedia devices in business, home, and personal networks. Because of our interest in incorporating the best available wireless technologies in our products, we have followed the Commission's progress in evaluating the UWB technology closely. The extensive record developed by the Commission reflects the high level of interest of companies in the proposed rule. It is Sony's view that there has been thorough testing which has demonstrated that the Commission can find a solution for innovative new applications of UWB technology to coexist with technologies in existing licensed and unlicensed bands.

With this information in mind, we would like to reconfirm Sony's previous statement to the Commission that UWB is a key enabling technology. Once the regulatory environment is settled, Sony intends to explore many new applications for the UWB technology that will help create and foster growth for many segments of the economy. In particular, Sony believes that UWB technologies have the potential for creating dramatically innovative, spectrally efficient new applications involving wireless multimedia communications.

We understand that some segments of the communications industry and some government users have voiced concerns regarding the potential for UWB interference with existing technologies. The Commission must balance the concerns of the incumbents and the opportunity for entrepreneurial innovation. Based on our review of the Commission's proposed rules and the significant amount of testing to which UWB has now been subjected, we believe that the Commission has sufficient information to issue rules that provide both protection for incumbents and a valuable opportunity for new technology deployment. Accordingly, Sony supports the introduction of UWB as the Commission proposed in its Notice of Proposed Rulemaking.

A timely conclusion of this rulemaking is in the interest of consumers, industry, and the economy. The Commission released its Notice of Inquiry on UWB in 1998 and has received extensive testing reports and comments to date. We encourage the Commission to issue a final rule by the end of 2001. A conclusion to the rulemaking is important so the nascent U.S. industry of UWB technology developers can begin making the critical transition from the laboratory to the commercial marketplace, and so companies such as Sony can explore and deploy practical, highly beneficial applications of UWB.

We thank you again for your consideration.

Sincerely,

A handwritten signature in cursive script, reading "Frank M. Jeske".

cc:

Commissioner Kathleen Abernathy

Commissioner Michael Copps

Commissioner Kevin Martin

Ms. Magalie R. Salas, Secretary (for inclusion in ET Docket No. 98-153)