



November 29, 2001

Ms. Magalie R. Salas, Secretary
Federal Communications Commission
Washington, D.C. 20554

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

Dear Ms. Salas:

On November 28, 2001, the Intelligent Transportation Society of America ("ITS America") submitted a written presentation in this docket noting that on August 24, 2001, a standard was adopted for intelligent vehicle uses in the 5.9 GHz band allocated by the Commission for use by Dedicated Short Range Communications ("DSRC") equipment. ITS America concludes that the potential for interference between UWB devices and DSRC equipment is significant, and requests that the Commission update its technical information on the potential for interference before considering an authorization for UWB devices below 6 GHz.

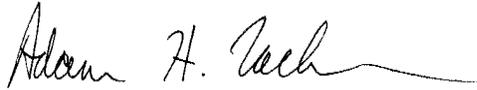
Atheros is a U.S. company designing technology and providing chipsets that will be used in DSRC equipment. Its AR5000 chipsets were used in the performance tests of IEEE 802.11a-standard compliant technology sponsored by the Federal Highway Administration. These tests concluded with adoption of a derivative form of this standard for DSRC equipment.

The record in this proceeding, including the submission of ITS America and the paper it attached that was submitted recently by Canada to ITU-R Study Group 8A/8B, raise significant concern UWB devices would cause harmful interference in the 5.9 GHz band.

Obtaining spectrum, adopting technical standards, and designing new and innovative equipment to increase the safety and efficiency of transportation is an important project for public safety. Twice the U.S. Congress recognized the significant public interest in developing this equipment. After studying the UWB proposals, however, we feel that the potential for harmful interference to DSRC equipment in the 5.9 GHz band is significant for the reasons set forth by ITS America.

Therefore Atheros wishes to express its agreement with and support of the submission made by ITS America. We join with ITS America to respectfully request that the Commission permit UWB devices intended for broadband communications operations only in spectrum above 6 GHz; or to at least obtain additional up-to-date information on the interference potential that would be created by such devices.

Respectfully submitted,



Adam H. Tachner
Intellectual Property Counsel

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