

December 4, 2001

Michael Powell
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Michael,

I am writing to convey the Aerospace Industries Association of America's (AIA) position on regulating ultra wideband (UWB) technology. AIA represents the nation's major manufacturers of commercial, military and business aircraft, helicopters, aircraft engines, missiles, spacecraft, materiel, and related components and equipment.

UWB offers the potential to greatly enhance safety, security, force protection and information superiority for many government and defense operations. UWB also has the potential to cause harmful interference to the Global Positioning System and to other critical national security and safety-of-life systems as well as numerous other commercial services, including fixed satellite and mobile services.

Over the past few months, DoD has been working with the National Telecommunications and Information Administration (NTIA) on proposed UWB emission levels and regulatory limitations in order to ensure the protection of DoD systems and the overall integrity of GPS services.

Expectation by many industry observers has been that UWB may be taken up at the Federal Communications Commission's December 12th agenda meeting. In a recent letter to Department of Commerce Secretary Don Evans, Deputy Defense Secretary Paul Wolfowitz said that DoD's preliminary assessment of the draft FCC rules for UWB "indicates they will not provide adequate protection for GPS and other critical DoD systems". Furthermore, Deputy Secretary Wolfowitz is seeking a delay in the FCC's taking any final regulatory decision on UWB until "at least February."

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AIA asks that the FCC support the Deputy Secretary of Defense's request to delay the final FCC regulatory decision on UWB until at least February. As a technology that can benefit so many different aspects of American society, we look forward to the introduction of UWB. However, it would be fruitless to introduce it in a way that jeopardizes our national security and flight safety.

If you have any questions or would like to discuss this further, please feel free to contact me directly at (202) 371-8500.

Very best regards,

A handwritten signature in black ink, appearing to read "John W. Douglass", with a long horizontal line extending to the right.

John W. Douglass

JWD:djl

cc: Commissioner Kathleen Q. Abernathy
Commissioner Michael Copps
Commissioner Kevin Martin
Deputy Secretary of Defense Paul Wolfowitz
Secretary of Commerce Donald Evans
Deputy Associate Administrator, Office of Spectrum Management NTIA
William Hatch
Assistant Secretary of Commerce for Communications and Information and NTIA
Administrator Nancy Victory