



APCO International

ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS INTERNATIONAL, INC.

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The Honorable Michael Powell
Chairman
Federal Communications Commission
445 12th Street, SW
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RE: Ex Parte Communication in ET Docket 98-153

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Dear Mr. Chairman:

I am writing to express serious concerns regarding the potential for Ultrawideband (UWB) operations in bands below 6 GHz, as discussed in the above-referenced pending proceeding. While some proposed UWB applications may be useful for public safety agencies, a greater concern is that widespread unrestricted deployment of commercial UWB devices could cause harmful interference to public safety radio systems and to critical GPS-based technologies used to locate emergencies.

Even minor levels of interference to public safety land mobile radio equipment can disrupt police, fire, EMS, and other operations that are protecting the safety of life, health and property. We are particularly concerned with uncontrolled, unpredictable UWB operations in indoor settings. Within buildings, low power portable public safety radios (all of which operate below 1 GHz) may be susceptible to signal degradation caused by increased noise levels produced by UWB devices. In the 800 MHz band, such radios are already facing interference from Nextel and other adjacent channel commercial systems using cellular architecture. Adding potential UWB interference to that scenario is unacceptable.

NTIA and others have recently submitted information to the Commission regarding the possible harmful effects of UWB transmissions on GPS signals. Pursuant to Commission regulations, commercial wireless carriers are currently implementing technologies to locate wireless emergency calls to 9-1-1. Many of those technologies utilize GPS signals to provide necessary accuracy. We are concerned, therefore, that such accuracy could be compromised as a result of UWB deployment.

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Therefore, we urge the Commission to proceed with great caution in its consideration of this important issue.

Respectfully submitted,



Glen Nash
President

cc: All Commissioners
Bruce Franca, Chief, OET
Thomas Sugrue, Chief, WTB
Michael Gallagher, Deputy Assistant Secretary, NTIA