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January 24, 2002

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

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

Dear Ms. Salas:

Pursuant to Section 1.1206(b) of the Commission's rules, I am writing on behalf of the Short Range Automotive Radar Frequency Allocation group ("SARA"), an association of automotive and automobile component manufacturers, to notify you of an *ex parte* meeting with Peter Tenhula, Senior Legal Advisor to Chairman Michael Powell, that occurred on Wednesday, January 23, 2002, concerning issues related to the above-referenced proceeding.

The meeting was held to address the use of 24 GHz ultra-wideband ("UWB") radar systems designed to enhance road safety. In the meeting, I: (1) urged the Commission to swiftly approve the unlicensed use of 24 GHz UWB automotive radar devices; (2) urged the Commission to promote competition and innovation by allowing for the use of pulse-based and non-pulsed based UWB automotive radar devices; and (3) emphasized the need by members of SARA to operate in a manner that results in intentional emissions into frequency bands in the 24 GHz range that are currently restricted pursuant to Section 15.205 of the Commission's rules.

In addition to discussing the aforementioned issues, I presented two proposals, outlined below, for clarifying the regulatory treatment of emissions produced by pulse-based 24 GHz UWB devices that use homodyne modulation techniques:

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Proposal A:

"The record in this proceeding demonstrates that several manufacturers are in the process of developing short range radar devices using carrier-based pulsed UWB technology. According to the Short Range Automotive Radio Frequency Allocation Group ("SARA"), these devices, which will operate in the 24 GHz range, will use homodyne modulation techniques, which means that they will transmit and receive radio signals using the same local oscillator. The devices will continually shift from transmitter to receiver function. For approximately 0.5 nanoseconds, a carrier-based pulsed UWB device will transmit a pulse across a bandwidth of 2500 MHz or more. This transmitter function will be followed immediately by a period of approximately 200-400 nanoseconds during which the device will function as a receiver of signals reflected off objects detected in the path of the host vehicle.

While performing the receiver function, the device will have some spurious emissions. We note, however, that, except for CB receivers, spurious emissions of receivers tuned to frequencies above 960 MHz are exempt from the emission limits set forth in Part 15. Therefore, at SARA's request, we clarify, consistent with existing Part 15 rules, that carrier-based pulsed UWB devices using homodyne techniques will be permitted to operate under the UWB rules promulgated herein, provided that they comply with the emission limits contained in section 15.209 of the Commission's rules when functioning as transmitters and conform to the provisions of section 15.101(b) of the Commission's rules when functioning as receivers."

Proposal B:

"At SARA's request, we clarify, consistent with Part 15, that for UWB devices that employ homodyne techniques,

> where the same frequency-generating circuitry is used for both the transmit and receive functions, existing Part 15 rules covering receiver emissions apply during the time the device is acting as a receiver."

An original and one copy of this letter is submitted for inclusion in the proceeding record.

Respectfully submitted,

Ari Q. Fitzgerald
Counsel for SARA

cc: Mr. Peter Tenhula