



The Honorable John W. Douglass  
President and Chief Executive Officer

February 1, 2002

The Honorable Michael Powell  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Dear Mr. Powell:

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.

I wanted to take this opportunity to express my deep concern regarding recent proposals for the unlicensed use of ultra-wideband (UWB) transmitters into restricted Federal safety-of-life and military radio frequency bands over the objections of the Department of Defense (DoD), Department of Transportation (DOT), and NASA. If the FCC allows UWB devices to operate on an unlicensed basis in these bands, virtually every radio service and those companies relying upon those radio services operating below 6.0 GHz will be adversely affected by the FCC's actions. These services include GPS, E-911, aviation radio-navigation, personal communications services (pcs), cellular telephone, digital satellite radio, and many Federal national security and safety-of-life services.

Diverse testing and analyses by the National Telecommunications & Information Administration (NTIA), Department of Transportation, universities, and industry has revealed that UWB devices interfere with GPS, and other Federal and commercial services. The disruption potential is even greater if UWB devices are permitted to operate in widespread commercial networks on an unlicensed basis. This is a critical concern for many Federal agencies, providing critical safety-of-life and economic services to our nation.

There is widespread support from affected government agencies and industry for the FCC to identify spectrum above 6 GHz for the operation of UWB devices. More than 45 entities have joined to urge policymakers to consider the mounting evidence favoring a cautious approach to the introduction of UWB devices in the commercial marketplace. Many of these are very large technology companies that rely on technological advances to maintain global leadership and to

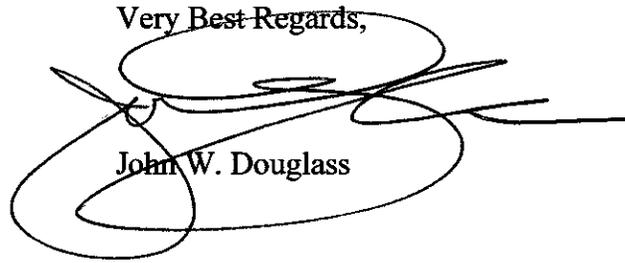
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remain competitive. They are also large employers who provide jobs for hundreds of thousands of Americans. In addition to concerns voiced by DoD, at least two heads of civilian agencies, the DOT and NASA, have written to Department of Commerce Secretary Donald Evans expressing concern about how to safely introduce *commercial* UWB. Some UWB services can currently be offered above 6 GHz. Most UWB companies have not started manufacturing UWB devices and could potentially reconfigure their hardware to meet this threshold.

AIA is advocating FCC authorization of UWB devices only above 6 GHz, with limited exceptions, where specifically authorized, for imaging devices below 1 GHz. This recommendation, and the emission restrictions advocated by the USG, would ensure that ultra-wideband technology development is consistent with national security and civil aviation safety needs.

I believe it would be helpful to arrange for a face-to-face meeting for us to discuss this issue in detail. With that in mind we will contact your office in the near future.

Very Best Regards,



John W. Douglass

JWD: djl

cc: Commissioner Kathleen Q. Abernathy  
Commissioner Michael Copps  
Commissioner Kevin Martin