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January 30, 2002

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th 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

Dear Chairman Powell:

Cisco Systems, Inc., the world leader in Internet networking, supplies networking solutions that are the foundation of the Internet and many corporate, education and government networks around the world. Developing and introducing to the public new technologies that bring the power of the Internet to people has been a key to our success. In that regard, wireless communications is one of our key areas of focus.

Cisco is aware that the emerging and promising technology of ultrawideband (UWB) wireless transmission cannot be utilized without a change in the rules governing Part 15 of the FCC's regulations. We urge you to issue a final report and order at the upcoming February Commission meeting, as you indicated you would do in December, and to implement rules that will allow the UWB industry to move forward while at the same time providing the needed protection to incumbent users in sensitive bands. We also believe this should be accomplished without limiting "peer-to-peer" operation of UWB devices to indoor use only.

UWB is a breakthrough wireless technology. Its ability to deliver high data rates using extremely low power levels is its unique and compelling characteristic due to the importance of "battery life" to mobile devices. We do not know of another technology currently available that delivers the combination of high date rate communications at extremely low power levels. This combination of low power and high data rate is very valuable to potential users, particularly with respect to "peer-to-peer" connections between mobile/wireless electronic devices themselves, in addition to the connection of such devices to the Internet.

Mobility is the key advantage of wireless communications. Handheld, battery-operated devices communicating directly with one another, or "peer-to-peer", are central to mobility. Rules that require UWB enhanced devices to be plugged in to a fixed outlet would greatly impair mobility and hence UWB's utility to the public.

It is our understanding that the original purpose of a ban on peer-to-peer operation was to keep UWB enhanced devices indoors and thereby allow them to operate at higher emissions levels. These levels were unacceptable to current government users of spectrum in sensitive bands. However, there appears to have been recent alternative proposals with much lower emissions

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levels--levels lower than those advocated by the GPS industry, for example, who have been the primary opponents of UWB rules. Cisco would urge the Commission to protect GPS via appropriate emissions levels--not by prohibiting critical peer-to-peer applications by individual users of UWB.

Thank you for your consideration of Cisco's views in this proceeding.

Very truly yours,

Christine Hemrick

Christine Hemrick
Vice President
Strategic Technology Policy Group

cc: The Honorable Kathleen Q. Abernathy
The Honorable Michael J. Copps
The Honorable Kevin J. Martin