



Wiley Rein & Fielding LLP

1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

Virginia Office
7925 JONES BRANCH DRIVE
SUITE 6200
McLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wrf.com

February 7, 2002

David E. Hilliard
202.719.7058
dhilliard@wrf.com

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: ET Docket No. 98-153 - Ultra-Wideband
Ex Parte

Dear Mr. Caton:

On behalf of Time Domain Corporation, I am submitting this proposed emissions mask as a practical, yet extraordinarily rigorous, set of limits to implement ultra-wideband on a Part 15 basis, if the ranging and location benefits of ultra-wideband, coupled with its ability to provide high data rate communications are to be realized – even on an indoor basis. The general mask illustrated below with the –12 dB down point at 2 GHz is as follows:

Assuming a 1 MHz RBW

Frequency, GHz	Power below Part 15 Class B, dB
Peak >3.25	0
2.75	-1
2.25	-8
2.00	-12
1565 -- 1585	-26
1.00	-26

Notes:

- 1) The ANSI Measurement procedure, C63.4, which is incorporated by reference into the FCC Rules, notes that applicants need not even report measurements that are 26 dB below the specified limit. The lowest such limit currently is the Part 15 general limit. This just further illustrates the extraordinary nature of some of the limits under consideration.
- 2) Emissions below L2 might be dominated by device unintentional emissions.

Wiley Rein & Fielding LLP

Ms. William F. Caton

February 7, 2002

Page 2

A shifting of the -12dB point substantially above two GHz will impair the ability of UWB systems to incorporate the tracking and ranging functions while also impairing the ability of UWB to communicate effectively through walls due to increased attenuation at higher frequencies, particularly at the extremely low power levels under consideration.

Pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. §1.1206, an original and a copy of this letter have been submitted for inclusion in the public record. Please contact me at the phone number listed above if you have any questions concerning this letter.

Respectfully,

/s/ David E. Hilliard

David E. Hilliard

Counsel for Time Domain Corporation

Encl.

cc: Messrs. Ed Thomas, Bruce Franca, Julius Knapp, John Reed, Peter Tenhula, Bryan Tramont, Paul Margie, and Ms. Monica Desai