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Wiley Rein & Fielding LLP

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Robert L. Pettit
202.719.7019
rpettit@wrf.com

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

February 8, 2002

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

William Caton, Acting Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

www.wrf.com

Re: Ex Parte Notification in ET Docket No. 98-153.

Dear Mr. Caton:

On February 7, 2002, Mimi Dawson, on behalf of Time Domain Corporation, contacted Monica Desai of Commissioner Martin's office by telephone to discuss the above-captioned proceeding. She reiterated the need for Commission action in this proceeding to adopt operational standards that would allow for the commercial development of ultra wideband technology and the Commission's authority to take such action pursuant to the agency's authority under Titles I and III of the Communications Act of 1934. The substance of her discussions are further reflected in a letter filed in this docket yesterday by Mr. Hilliard. For your convenience, a copy of this letter is enclosed.

In accordance with the Commission's rules, an original and one copy of this notification are being filed. If you have any questions or would like anything further, please let me know.

Sincerely,

Robert L. Pettit

Enclosure

cc: Monica Desai, Esquire

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

David E. Hilliard
202.719.7058
dhilliard@wrf.com

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

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.

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Ms. William F. Caton
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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