

HAGER GEOSCIENCE, INC.

596 MAIN STREET, WOBURN, MASSACHUSETTS 01801-2924

TELEPHONE: (781) 935-8111 FAX: (781) 935-2717

To the FCC:

I am writing against the proposed new rules governing Ultrawideband (UWB) transmitters. My company provides geophysical services that in large part use the technique of ground penetrating radar (GPR), which uses a UWB transmitter. GPR transmits signals into the ground, not into air, and is successfully used in a large variety of applications in the construction, geotechnical, and environmental industry. Many of these uses relate directly to public safety.

If our industry is to stay viable, the FCC must regard GPR differently from other UWB devices. We believe that GPR should be considered as a spurious transmitter in air; therefore, it must conform to the existing emission limits of FCC Rules, Part 15 Class B. Testing should take place on concrete or sand to approximate operating conditions. Operator licensing should not be required.

We urge you to consider these recommendations. The proposed new regulations would both prohibit users of GPR systems like us from continuing work in our industry and make us ineligible to obtain licensing. The economic impact of these proposed regulations will severely impact, if not destroy, my company and many others like it.

Respectfully yours,

Hager GeoScience, Inc.

Jutta L. Hager, Ph.D.

President

