

I am a professional geologist employed in the environmental consulting industry since 1985. Our industry relies heavily on ground penetrating radar (GPR) which emits ultrawide band (UWB) energy directed into the ground to identify subsurface stratification, buried conduits, buried drums, and storage tanks.

GPR has been used on EPA Superfund Sites and provides a cost effective approach to subsurface exploration and characterization which is invaluable to the industry and US business in general.

GPR is also used as a forensic tool in police investigations and has been used to find buried bodies and other evidence.

To ban this technology or limit its use to governmental and research agencies is absurd and short sighted. Certainly the FCC does not actually intend to strip the environmental industry of this very valuable and cost effective tool? Why is the FCC considering terminating the livelihoods of thousands of US citizens and hundreds of business enterprises that have been engaged in the GPR industry for approximately 32 years. To date the FCC has not received any complaints regarding GPR interference with receivers. If newly developed receivers experience interference from GPR units it is the newly developed receiver that should be banned or modified. Why penalize an industry that was in business before cell phones and other receivers were even imagined.

I have written this message as a consultant who does not own and operate a GPR unit. I do frequently sub-contract GPR technical services. If the FCC denies environmental, structural engineering, and geological exploration companies the opportunity to continue using GPR, US business will suffer do to increased costs of services associated with using alternative more costly procedures for gathering the information provided by GPR.