



October 27, 2000

VIA HAND DELIVERY

Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, TW-A325  
Washington, DC 20554

RECEIVED  
OCT 27 2000  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: \ Revision of Part 15 of the Commission's Rules Regarding  
Ultra-Wideband Transmission Systems, ET Docket No. 98-153

Dear Ms. Salas:

Enclosed are an original and five copies of the Alliance for Telecommunications Industry Solutions' ("ATIS") reply comments in response to the FCC's Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding. Please date-stamp and return the extra copy to our messenger.

Please contact me 202/434-8847 if you have any questions or comments.

Sincerely,

Megan Campbell  
General Counsel

Enclosures

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ATIS Communications

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Susan M. Miller  
ATIS

Vice President of Finance  
& Operations  
William J. Klein  
ATIS

General Counsel  
Megan L. Campbell  
ATIS

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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OFFICE OF THE SECRETARY

In the Matter of )  
)  
Revision of Part 15 of the Commission's )  
Rules Regarding Ultra-Wideband )  
Transmission Systems )

ET Docket No. 98-153

**REPLY COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS**  
**INDUSTRY SOLUTIONS (ATIS)**

Submitted by,

Megan L. Campbell  
General Counsel  
ATIS  
1200 G Street, N.W.  
Suite 500  
Washington, D.C. 20005  
202-434-8847  
mcampbel@atis.org

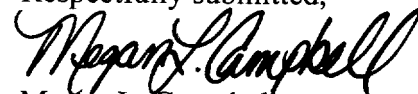
Dated: October 27, 2000

**REPLY COMMENTS OF THE ALLIANCE FOR TELECOMMUNICATIONS  
INDUSTRY SOLUTIONS (ATIS)**

ATIS submits these reply comments on behalf of its sponsored Committee T1 in response to the Commission's Notice of Proposed Rulemaking ("NPRM"), In the Matter of Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems, released on May 11, 2000. Specifically, ATIS files in support of a position taken by the United States Department of Commerce, National Telecommunications and Information Administration ("Commerce Department") in its comments filed on October 6, 2000 in this proceeding.

Committee T1 concurs with the position taken by the Commerce Department in paragraph 28 of its October 6th comments regarding the authorization of Ultra-Wideband (UWB) devices and the potential resulting interference to Global Positioning System (GPS) services. Committee T1 expresses concern with the proposed authorization and use of any UWB devices or services and the potential effects on the reception of signals from the GPS. Committee T1 recommends further engineering studies be conducted and that UWB devices or services be authorized only if it is determined that there are no performance impacts on GPS receivers.

Respectfully submitted,



Megan L. Campbell

General Counsel

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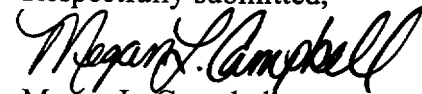
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General Counsel

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