



October 10, 2019

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: *Request by Humatics for Waiver of Section 15.519(a) of the Commission's Rules*, ET
Docket No. 19-242

Dear Ms. Dortch:

Humatics respectfully submits this letter in support of its Request for Waiver of Section 15.519(a) of the Federal Communications Commission's ("FCC" or "Commission") rules filed in the above captioned proceeding.¹ Only a single party—the GPS Industry Association ("GPSIA")—filed timely comments in response to the Commission's Public Notice of the Humatics Waiver Request, comments that Humatics addressed in its recently filed reply.² Aviation Spectrum Resources, Inc. ("ASRI"), however, elected to defer filing comments until the reply deadline,³ and, consequently, raised a number of duplicative issues now already addressed on the record.⁴ Nonetheless, in the interest of clarity, Humatics herein addresses ASRI's questions in support of its Waiver Request.

¹ See Humatics Request for Waiver, ET Docket No. 19-242 (filed July 16, 2019) ("Waiver Request").

² See Reply Comments of Humatics, ET Docket No. 19-242 (filed Oct. 1, 2019) ("Humatics Reply Comments"); see also Comments of the GPS Innovation Alliance, ET Docket No. 19-242 (filed Sept. 16, 2019) ("GPSIA Comments").

³ See Comments of Aviation Spectrum Resources, Inc., ET Docket No. 19-242 (filed Oct. 1, 2019) ("ASRI Comments"); see also *Office of Engineering and Technology Seeks Comment on Humatics Corporation Request for Waiver of Section 15.519(A) of The Rules for an Ultra-Wideband System That Employs Fixed Infrastructure*, Public Notice, ET Docket No. 19-242 (rel. Aug. 27, 2019).

⁴ See ASRI Comments at 1.

Frequency Bands of Operation and Proof of Platform Device GPS Compatibility

In comments, ASRI claimed that the frequency bands in which Humatics seeks to operate are “unclear” from the Humatics Waiver Request.⁵ ASRI asked that the Commission require Humatics to provide more specific information regarding the frequency bands in which its Spatial Intelligence Platforms will operate.⁶ ASRI also requested that Humatics submit additional information regarding the compatibility of its Platform devices with authorized aviation operations, including GPS receivers used in aviation.⁷

In reply comments, Humatics addressed ASRI’s operating frequency concern, noting transmission specifics relevant to FCC certification. Specifically, Humatics provided that the transmit frequency range of the Humatics Radio is from 3.1 GHz to 4.8 GHz.⁸ In addition, Humatics responded to GPSIA’s very similar concerns regarding GPS interference.⁹ Humatics noted, in particular, that it has developed other UWB equipment that fully protects GPS reception and the Humatics Spatial Intelligence Platform will maintain the same required protections for GPS.¹⁰ Moreover, Humatics observed that it relies on GPS as an input into its outdoor location engine to cross-check UWB results and also utilizes high-precision GPS to validate trial results for independent testing.¹¹ Therefore, Humatics is committed to operating under the technical limits of the Commission’s Part 15 rules, including protection of GPS.

Fields of Use

ASRI also submits that “any waiver grant also be limited to the fields of use specifically spelled out in the Request” among its more general concerns related to the scope of the waiver and product specifications.¹² We again note that these questions were raised by GPSIA and addressed by Humatics’ reply comments.¹³ However, to resolve any remaining uncertainty, Humatics reiterates that it is not seeking a waiver to create a wide-area network. Instead, customers will deploy its devices only in controlled areas, such as industrial, transportation, or commercial environments, and only to support the position determination system. Humatics will not deploy systems for broader data communications networking.

⁵ See *id.* at 3.

⁶ *Id.*

⁷ *Id.*

⁸ Humatics Reply Comments at 8.

⁹ *Id.* at 3.

¹⁰ *Id.*; see also Waiver Request at 12, n.11.

¹¹ Humatics Reply Comments at 3.

¹² ASRI Comments at 3.

¹³ See Humatics Reply Comments at 4-5 (providing scope of waiver and product specifications).

This letter is submitted pursuant to Section 1.1206(a) of the Commission's rules. Please direct any questions to the undersigned.

Respectfully submitted,

HUMATICS CORPORATION

/s/ David Mindell

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cc: Julius Knapp
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