

Dataspeed Inc.  
1935 Enterprise Dr.  
Rochester Hills, MI 48309

October 12, 2018

Federal Communications Commission  
445 12th Street SW, Washington, DC 20554

Re: ET Docket 18-284, Metrom Rail Request for Waiver

Dear Office of Engineering and Technology,

We are writing in response to Metrom Rail LLC (Metrom) request for a waiver of certain Part 15 rules as part of the Public Comment period. This request is in the public interest by promoting safer train and transit operations. Dataspeed Inc. has extensive experience utilizing UWB for ranging applications. The accuracy and robustness of the ranging measurements creates confidence in deployment of a safe and reliable localization system as used by Metrom rail. Failures in accurately determining the location of rail assets, whether absolutely, or relative to other rail assets can lead to disaster. Use of UWB for rail applications should be allowed such that better localization systems can be deployed.

Metrom is asking for certain rule parts to be waived, and has offered a reasonable rationale for their requests:

- This waiver request is limited to the rail operators, such as municipals, thus the overall number of units deployed is relatively small and under operational controls.
- The system is limited to rail tracks and equipment along rail tracks, thus the location is specially known and can be monitored.
- The fixed outdoor infrastructure proposed is under the control of the system operators, is part of the rail system, and uses the strictest of the UWB spectrum masks.
- The additional gain for the directional antennas requested by Metrom will be directed along the track and have commented that the out-of-band emissions will not be any greater than the current Part 15 UWB rules allow.
- Surveillance systems are allowed to operate outdoors under the UWB rule parts by similar parties (Part 90 users) but with less strict emissions masks.
- The argument for handheld equivalence is logical and effectively has already been made by other companies in their use of UWB today.

We continue to support the FCC's issuance and allowance of the Special Temporary Authority (STA) and Waiver process. Requesting and granting waivers is a very important process that allows for the FCC and other concerned government bodies as well as the public and private industry to gather real world data and proof points about technology, specifically UWB, while being on a limited scale. This real-world data is extremely helpful in evaluating how UWB technology can be safely deployed in the future.

Overall, we are in support of this waiver request and see both the public value and the efforts made to address potential concerns.

Sincerely,

Paul Fleck  
Founder and CEO, Dataspeed Inc.