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October 18, 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,

I am writing in strong support of the Metrom Rail LLC (Metrom) request for a waiver of certain Part 15 rules as part of the Public Comment period. I believe the Metrom use case will lead to safer and more efficient rail operations. My Company, IBM is very active in the instrumentation and optimization of many types of ail and logistics systems. The rail systems in this country are aging and the instrumentation used to control and monitor them is significantly out of date. Unfortunately, this can be seen in the number of rail accidents that occur. The type of monitoring that Metrom is proposing here will make real time monitoring of trains more accurate and reliable which will lead to fewer deaths and injuries to passengers and less property damage. The same improved accuracy will allow better analytics that will lead to improved throughput of both passengers and freight.

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

* The FCC waiver they request is limited to the rail operators, such as municipals, so the total number of units deployed will be small and controlled
* The radio systems in use will be placed only on tracks and equipment along rail tracks, so their location will be known and easily monitored.
* The outdoor gear they propose to install will be under of the system operators, is part of the rail system and will be under their control., The devices will be set to the strictest UWB spectrum masks.
* The directional antennas requested by Metrom for higher gain will be aimed 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.
* There is precedent that 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 Metrom makes for handheld equivalence is logical and has already been made by other companies in their use of UWB today.

We at IBM support the FCC’s issuance and allowance of the Special Temporary Authority (STA) and Waiver process. We believe that 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 industry partners to gather real world data about technology, specifically UWB, while being on a limited scale. This real-world data which is currently in short supply s 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,



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