



October 22, 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,

Proterra is 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. Proterra is a leader in the design and manufacture of zero-emission electric buses in the US and it has successfully sold more than 700 vehicles to over 90 customers. These customers are in 39 states across the US and 2 Canadian provinces. New York, Philadelphia, Seattle and Chicago are some of the major US cities that have chosen Proterra to help transition its' aging transit fleets with safe, quiet, clean efficient battery electric buses. Proterra knows it is in the public interest to promote safer transit and rail. Safety is the number one priority in all transit operations.

As Metrom stated, and a quick internet search will reveal, train and transit accidents do happen and unfortunately often end in injuries or even deaths. Allowing for safer train operations both for the operators and the civilian occupants is imperative. Additionally, safety systems such as the one Metrom is requesting to be allowed will save the cities money (thus the taxpayers) and offer greater efficiencies such as more trains that can operate more closely or more often, which is a benefit to all.

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,

Kent Leacock

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Proterra Inc.

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